

## **CONTENTS OF PRIVACY POLICY**

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### **1. Introduction**

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

### **2. Explaining the legal bases we rely on**

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### **Consent**

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order products from us, we'll collect your address details to deliver your purchase.

#### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Funslinger Ltd to law enforcement.

#### **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the purchase history of our customers to identify trends and ensure we can keep up with demand or develop new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

### **3. When do we collect your personal data?**

When you visit any of our websites, and use your account to buy products and services.

When you contact us by any means with queries, complaints etc.

When you engage with us on social media.

When you ask us to email you information about a product or service.

When you enter prize draws or competitions.

When you comment on or review our products and services.

When you choose to complete any surveys we send you.

When you've given a third party permission to share with us the information they hold about you.

### **4. What sort of personal data do we collect?**

Details of your interactions with us through telephone, or online.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, vouchers, redemptions, web pages you visit and how and when you contact us.

- Details of your visits to our websites or apps, and which site you came from to ours. We'll only ask for and use your personal data collected for recommending items of interest. Of course, it's always your choice whether you share such details with us.

- Payment card information.

- Your comments and reviews.

- To deliver the best possible web experience, we collect technical information about your internet connection and browser, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.

- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

### **5. How and why do we use your personal data?**

- To process any product orders that you make by using our websites. If we don't collect your personal data, we won't be able to process your order and comply with our legal obligations.

- For example, your details may need to be passed to a third party to supply or deliver

the product you ordered, and we may keep your details for a reasonable period afterwards in order to fulfill any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.
- For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone and through our contact centres about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.
- Of course, you are free to opt out of hearing from us by any of these channels at any time.
- To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.
- You are free to opt out of hearing from us by post at any time.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, any changes to the service or product you have purchased and legally required information relating to your transactions. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.
- To comply with our contractual or legal obligations to share data with law enforcement.
- For example, when a court order is submitted to share data with law enforcement agencies or a court of law
- To send you survey and feedback requests to help improve our services. These

messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

- Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

## **6. How we protect your personal data**

We will treat your data with the utmost care and take all appropriate steps to protect it. We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

## **7. How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **8. Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties, for example, for fraud management, carrier services or to handle complaints and so on.

When we share personal data with third party organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.
- Data insight companies to ensure your details are up to date and accurate.

### **Sharing your data with third parties for their own purposes:**

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell our company or a group company and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.
- For further information please contact our Data Supervisor.

## **9. Cookies**

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies and other such software on our website contain information that is transferred to your computer's hard drive. They help us to improve the website and to deliver a better and more personalised service.

This includes, but is not limited to:

- Your IP address
- Your operating system
- Your browser type
- The name of your internet service provider
- The date, time and duration of your visit
- The name and URL of pages you access

The website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the website.

## **10. Where your personal data may be processed**

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as U.S.A. Protecting your data outside the EEA The EEA includes all EU Member countries as well as Iceland,

Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA. For example, this might be required in order to fulfil your order, process your payment details or provide support services. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Manager. Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

### **11. What are your rights over your personal data?**

You have the right to request: Access to the personal data we hold about you, free of charge in most cases. The correction of your personal data when incorrect, out of date or incomplete. That we stop using your personal data for direct marketing (either through specific channels, or all channels). That we stop any consent-based processing of your personal data after you withdraw that consent. Review by us of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision). You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Data Supervisor, email [info@funslinger.co.uk](mailto:info@funslinger.co.uk) Your right to withdraw consent whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent. Where we rely on our legitimate interest in cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request. Checking your identity to protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

**12. We will not use your personal data for direct marketing, unless you specifically ask us to do so.**

### **13. Contacting the Regulator?**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the relevant authority e.g. Information Commissioner's Office.