

# Polytag's Privacy Policy

Last Updated September 2024

## Our commitment to you

Here at Polytag Limited, we are committed to protecting and respecting the privacy of your personal data. This privacy notice explains how your data is collected, used, transferred, and disclosed. It applies to data collected when you:

- Use our websites
- Use our iOS and Android applications
- Interact with us through social media, email, or phone
- Participate in our competitions or events

We take the protection of your personal data seriously and will process your personal data fairly, lawfully, and transparently. This privacy notice describes the personal data we are collecting about you and how it is used. We will only collect and use your personal data for the following purposes:

- To fulfill your order(s)
- To keep you up to date with the latest offers and trends
- To help us make our marketing more relevant to you and your interests
- To improve our services
- To meet our legal responsibilities

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## How we keep your data safe and secure

We have appropriate organisational safeguards and security measures in place to protect your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. The communication between your browser and our website uses a secure encrypted connection wherever your personal data is involved. We require any third party who is contracted to process your personal data on our behalf to have security measures in place to protect your data and to treat such data in accordance with the law. In the unfortunate event of a personal data breach, we will notify you and any applicable regulator when we are legally required to do so.

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## The personal data we collect

Personal data means any information about an individual from which that person can be identified. It does not include anonymised data, where the identity and identifying information have been removed. The following groups of personal data are collected:

- Identity Data includes information such as: first name, last name, title, date of birth (optional), occupation, personal description, photo and gender.
- Contact Data includes information such as: email address, delivery address, location, country, telephone number, loyalty programme membership number, and social media id (if you log in by social media).
- Transaction Data includes information such as: details of your product number; payments to and from you and details of other products and services you have obtained from us, correspondence or communications with you in respect of your details of any rewards and bonuses awarded.
- Account information includes information such as: login name and password chosen by you, and details of the products and services added to your brand account.
- Technical Data includes information such as: details of the device(s) you use to access our services, your internet protocol (IP) address, login data, your username and password, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.
- Usage Data includes information such as: how and when you use our website/app, how you moved around it, what you searched for; website/app performance statistics, traffic, location, weblogs and other communication data; loyalty programme activities; and details of any other products and services used by you.
- Marketing and Communications Data includes information such as: your preferences in receiving marketing.

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## How we collect your data

We may collect personal data about you in the following ways:

### Direct interactions

You may give us your Identity, Contact, Transaction, Profile, and Marketing and Communications data (as described above) by filling in forms, entering information online or by corresponding with us by post, phone, email, telephone or otherwise. This includes personal data you provide, for example, when you:

- Contact us with an enquiry or to report a problem (by phone, email, social media, or messaging service);
- When you log in to our website or app.

#### Automated technologies or interactions

As you interact with our website, we may automatically collect the following types of data (all as described above): Technical Data about your equipment, Usage Data about your browsing actions and patterns, and Contact Data where tasks carried out via our website remain uncompleted. We collect this data by using cookies, server logs and other similar technologies. Please see our [\[Cookie Policy\]](#)([\[Link to Cookie Policy\]](#)) for further details.

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## How we use your data

We will only collect and process your personal data where we have a legal basis to do so. As a data controller, the legal basis for our collection and use of your personal data varies depending on the manner and purpose for which we collected it. We will only collect personal data from you when:

- we have your consent to do so, or
- we need your personal data to perform a contract with you (for example, to provide customer support connected with an enquiry), or
- the processing is in our legitimate interests and not overridden by your rights, or
- we have a legal obligation to collect or disclose personal data from you.

## Uses made of your personal data

Your personal data is used by us to support a range of different activities. These are listed in the table below together with the types of data used and the legal bases we rely on when processing them, including where appropriate, our legitimate interests. Please be aware that we may process your personal data using more than one lawful basis, depending on the specific activity involved. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To create an account and register you as a new customer (either directly or via social media).	Identity, Contact	Performance of a contract with you
To process and deliver your circular reward including: recording your transaction details; keeping you informed about the order status; process payments and refunds, collect money owed to us; and automated decision making to assist fraud prevention and detection.	Identity, Account Contact, Financial, Transaction	Performance of a contract with you, Necessary for our legitimate interests (for automated decision making we consider that fraud detection and prevention is in our legitimate interests to ensure that fraudulent transactors are unable to benefit from our services and in the legitimate interest of the public as a whole due to the impact of fraud on the consumer market; we also consider it a necessary element of entering into a contract with you that we are able to verify your identity and prevent fraud).
To manage our relationship with you, including: providing you with any information, products and services that you request from us; notifying you about changes to our services, terms and conditions or privacy notice; asking you to leave a review or take a survey.	Identity, Account, Contact, Profile, Marketing and Communications	Performance of a contract with you, Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)
To enable you to take part in a competition, event, survey, or receive a reward for transacting with us.	Identity, Contact, Profile, Usage, Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products and services, to develop and grow our business), Where you have entered a competition or event,

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
		for the performance of a contract
To administer, protect and improve our business and our website/app, including: troubleshooting, data analysis, testing, system maintenance, support, data analysis, reporting and hosting of data; setting default options for you, such as language and currency.	Identity, Account, Contact, Profile, Technical, Transaction, Marketing and Communications	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, and to detect and prevent fraud), Necessary to comply with a legal obligation
To deliver relevant website content, online advertisements and information for you; and measure the effectiveness of the advertising provided.	Identity, Account, Contact, Profile, Technical, Usage, Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to: improve our website, products, services, marketing, customer relationships and experiences; and for market research, statistical and survey purposes.	Technical, Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To recommend products, services, discounts and offers that may be of interest to you, including to send you such information by email, post or SMS.	Identity, Contact, Profile, Technical, Usage, Marketing and Communications	Necessary for our legitimate interests (to develop our products and services and grow our business) or Consent. See further details in the section 'Marketing preferences, adverts and cookies'
To inform or remind you by email of any task carried out via our website/app which remains uncompleted.	Identity, Contact, Usage	Necessary for our legitimate experience of our customers
To protect our customers, group companies and website from fraud and theft	Identity, Contact, Profile	Necessary for our legitimate interests (to detect and prevent fraud)

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We may process personal data without your consent, in compliance with the above rules, where this is required or permitted by law.

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## Data Retention

We will keep your personal data for no longer than is necessary for the purpose(s) it was provided for and to meet our legal obligations. Further details of the periods for which we retain data are available on request.

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## Marketing Preferences, Adverts, and Cookies

### Marketing – Your Preferences

We may send you marketing communications and promotional offers:

- If you have opened an account with us or registered for a promotion or event, and you have not opted out of receiving that marketing (in accordance with your preferences, as explained below);
- By email, if you have signed up for email newsletters;
- If you have provided us with your details when you entered a competition and have consented to receiving such marketing (in accordance with your preferences, as explained below).

We may use your Identity, Contact, Technical, Transactional, Usage, Profile Data, and Marketing and Communications Data to form a view on what we think you may like or what may be of interest to you and send you details of products and offers that may be relevant to you.

We will ask you for your preferences in relation to receiving marketing communications by email, post, SMS, and other communication channels. From time to time, we may also include with your transactions inserts advertising goods, services, or offers from other third-party companies that may interest you.

In respect of third-party marketing communications, we will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us (or any third party, if applicable) at any time:

- You can unsubscribe or 'opt-out' by using the unsubscribe button and following the link included in the footer of any marketing email; or
- Account holders may withdraw their consent by simply logging into "My Account" and editing your 'Contact Preferences'.

We will process all opt-out requests as soon as possible, but please note that due to the nature of our IT systems and servers, it may take a few days for any opt-out request to be implemented.

## Cookies

Our website uses cookies to distinguish you from other users and to keep track of your visits. Cookies help us provide you with the best experience when browsing our website and making improvements. They also assist us and our advertising networks in making advertising relevant to you and your interests.

You can set your browser to refuse all or some browser cookies or alert you when websites set or access cookies. If you disable or refuse cookies, some parts of our website may become inaccessible or not function properly.

For detailed information on the cookies we and our third-party providers use and why we use them, please refer to our [Cookie Policy](#).

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## How We Share Your Data

We may disclose and share your personal data with the parties set out below:

- Business partners, suppliers, sub-contractors, and other third parties we use in connection with running our business, such as:
    - Third-party service providers that we engage to provide IT systems, software, and to host our website and app;
    - Analytics and search engine providers that assist us in improving and optimising our website;
  - Any third party to whom we may choose to sell, transfer, or merge parts of our business or assets. If a change occurs in our business, the new owners may use your personal data as described in this privacy notice;
  - If we are under a duty to disclose or share your personal data to comply with legal obligations;
  - Our professional advisers, including lawyers, bankers, auditors, and insurers who provide consultancy, legal, and insurance services.
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## Your Data and Countries Outside of Europe

The personal data we collect from you may be transferred to and stored at destinations outside the European Economic Area (“EEA”) using legally-provided mechanisms to lawfully transfer data across borders. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in processing and providing support services.

We will take all necessary steps to ensure your data is treated securely and in accordance with this privacy notice. Whenever we transfer personal data outside the EEA, we will ensure a similar degree of protection by ensuring appropriate safeguards, as required by law, are in place. This may include using specific contractual clauses approved by the European Commission. More information about these is available [here](#).

Please contact us if you want further information on the countries to which we may transfer personal data and the specific mechanism used by us when transferring your data outside the EEA.

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## Your Rights

You have several rights under data privacy legislation. This includes, under certain circumstances, the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Request restriction of processing of your personal data
- Request the transfer of your personal data
- Object to the processing of your personal data
- Request human intervention for automated decision-making

For further information or to exercise your rights, please email us at [info@polytag.io](mailto:info@polytag.io).