

PRIVACY POLICY

Data Select Limited (**Data Select, we, or us**) is a company incorporated in England and Wales. Our registered office is Network House, Third Avenue, Globe Park, Marlow, Buckinghamshire SL7 1EY.

This policy sets out the basis on which any personal data (meaning information about an individual from which that individual can be personally identified) we collect from you, or that you or others provide to us, will be processed by us.

For the purpose of data protection laws, the data controller is Data Select Limited.

1 BASIS FOR PROCESSING PERSONAL DATA

1.1 Paragraphs 1.2 – 1.6 below explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

1.2 **To enter into contracts with you:** Where you order goods from us, we will process your personal data to process your order and deliver those goods to you. Our use of your personal data in this way includes sharing your personal data with delivery companies and other subcontractors, such as payment providers, as well as credit reference agencies for the purposes of assessing fraud, credit and/or security risks. We need to process your personal data in this way to enter into and perform the contract for the sale of goods or services at your request. If you do not wish to provide us with your personal data in this way, you will be unable to purchase goods or services from us.

1.3 **To make our site better:** We will also process your personal data in order to provide you with a more effective user experience (such as by optimising our site differently depending on which device you are accessing it from). This processing means that your experience of our site will be more tailored to you.

We will also process your personal data for the purposes of making our site more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis on which we process your data in these circumstances is our legitimate interest to provide you with the best browsing experience we can, and to ensure that our site is kept secure.

We also use various cookies to help us improve our site (more details are set out in section 3). The use of non-essential cookies is subject to your consent. You can also prevent us from using your personal data in this way by setting your web browser to refuse cookies, or by using the 'do not track' functionality in your internet browser. If you enable such do not track functionality, our site may be less tailored to your needs and preferences.

1.4 **To provide customer services to you:** We may also process your personal data in order to provide various supporting customer services to you (such as where you contact us with a question in connection with an order, or where you have asked to receive order updates via text message). The legal basis on which we process your personal data in these circumstances is your consent. If you do not provide us with the personal data we request from you for customer services purposes, we may not be able to fully provide the relevant customer services to you.

For marketing purposes: Where you have opted in via our site, or otherwise asked to receive marketing communications from us, we will process your personal data to provide you with marketing communications in line with the preferences you have provided. The legal basis on which we process your personal data is your consent. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at marketing@dataselect.com or, where relevant, by following the unsubscribe link in every marketing communication you receive from us.

1.5 **If our business is sold:** We will transfer your personal data to a third party:

1.5.1 in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with data protection legislation); or

1.5.2 if Data Select or substantially all of its assets are acquired by a third party, in which case personal data held by Data Select about its customers will be one of the assets transferred to the purchaser,

in each case, the legal basis on which we process your data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of your personal data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

1.6 In certain circumstances we may also need to share your personal data if we are under a duty to disclose or share personal data in order to comply with a legal obligation.

2 CATEGORIES OF INFORMATION WE COLLECT FROM YOU

We will collect and process the following personal data:

2.1 **Information you give us:** This is information about you that you give us by filling in forms on our site, or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you enter a competition, promotion, incentive or survey, and when you report a problem with our site. The information you give us may include names, addresses, email addresses and phone numbers.

2.2 **Information we collect about you:** With regard to each of your visits to our site we will automatically collect the following information:

2.2.1 technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and

2.2.2 information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

2.3 **Information we receive from other sources:** We may receive information about you when you use our site, or when organisations you have purchased from ask us to

provide you with updates in connection with your order. We are also working closely with third party marketing service providers (as well as other business partners, sub-contractors, advertising networks, analytics providers, hosting providers and search information providers) from whom we may also receive information about you.

2.4 We do **not** process any special categories of personal data, meaning personal data revealing:

2.4.1 racial or ethnic origin;

2.4.2 political opinions; religious or philosophical beliefs or trade union membership;

2.4.3 genetic or biometric data that uniquely identifies you;

2.4.4 data concerning your health, sex life or sexual orientation; or

2.4.5 data relating to criminal convictions or offences or related security measures.

3 COOKIES

3.1 Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

3.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

Cookie	Purpose	Expiration time	Name	More information
comment_author_{HASH} comment_author_email_{HASH} comment_author_url_{HASH}	When you comment on our blog, cookies are stored on your computer. This is purely for your convenience, so that you won't need to re-type all your information again when you want to leave another comment.	Less than a year.	WordPress Comments	https://codex.wordpress.org/WordPress_Cookies
_ga	Used to distinguish users.	2 years	Google Analytics	https://developers.google.com/analytics/devguides/collection/analyt
_gid	Used to distinguish users.	24 hours		

_gat	Used to throttle request rate.	1 minute		icsjs/cookie-usage
AMP_TOKEN	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight requests or an error retrieving a Client ID from AMP Client ID service.	30 seconds to 1 year		
gac<property-id>	Contains campaign related information for the user.	90 days		
SESSION_ID	When you log in to our Platinum Club, the SESSION_ID cookie get and/or sets the current session ID. A session ID is a unique number that a Web site's server assigns a specific user for the duration of that user's visit (session).	After session	PHP	http://php.net/manual/en/function.session-id.php

3.3 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

3.4 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

3.5 Except for essential cookies, all cookies will expire before 12 months, please see the table above for more specific expiration times.

4 **USES MADE OF THE INFORMATION**

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5 **WHERE WE STORE PERSONAL DATA**

5.1 The data that we collect from you will be stored in a secure location in the UK. We will

take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

- 5.2 All information you provide to us is stored on a secure server in the UK. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share your password with anyone.

6 PERIOD OF STORAGE

- 6.1 Where we processed your data to provide you with order updates, we will retain your data for a period of 6 years, to ensure that we are able to assist you should you have any questions, feedback or issues in connection with your order.
- 6.2 Where we have processed your personal data to provide you with marketing communications, we will contact you at least every 12 months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our lists.
- 6.3 Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with a product) subject to section 6.1 above, we will retain your data for 6 years.

7 YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

- 7.1 You have the right to object to us processing your personal data where we are processing your personal data:
- 7.1.1 based on our legitimate interests (as set out at sections 1.3 and 1.5 above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and
- 7.1.2 for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.

8 YOUR OTHER RIGHTS UNDER DATA PROTECTION LAWS

Right of access

- 8.1 You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing. You can exercise such right by contacting us at gdpr@dataselect.com. If you exercise this right before 25 May 2018, your request will be subject to a £10 fee.

Right to rectification

- 8.2 You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

Right to restriction

- 8.3 You have the right to restrict our processing of your personal data where:
- 8.3.1 the accuracy of the personal data is being contested by you;
 - 8.3.2 the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
 - 8.3.3 we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or
 - 8.3.4 we are processing your data on the basis of our legitimate interest (as set out at sections 1.3 and 1.5 above) and you:
 - 8.3.4.1 object to our processing on the basis of our legitimate interest under section 7.1.1 above; and
 - 8.3.4.2 want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.
- 8.4 Where any exercise by you of your right to restriction determines that our processing of particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

Right to data portability

- 8.5 You have the right to receive your personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

Right to erasure

- 8.6 You have the right to require we erase your personal data which we are processing where one of the following grounds applies:
- 8.6.1 the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
 - 8.6.2 our processing of personal your data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;
 - 8.6.3 you object to the processing in as set out in section 7.1.1 of this policy and we have no overriding legitimate interest for our processing,
 - 8.6.4 the personal data have been unlawfully processed; and
 - 8.6.5 the erasure is required for compliance with a law to which we are subject.
- 8.7 You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

9 LINKS ON OUR SITE

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. Our service connects you to different websites. If you follow a link to any of these websites or use our service, please note that you have left our site and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

10 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

11 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to gdpr@dataselect.com.

This privacy policy was last updated on 27th April 2018.