

## Privacy Policy

### 1. INTRODUCTION

- 1.1 Uniqodo Limited ("We") are committed to protecting and respecting your privacy.
- 1.2 This policy (together with our Terms of Website Use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the Website you are accepting and consenting to the practices described in this Privacy Policy.
- 1.4 For the purpose of the Data Protection Act 2018 (the "Act") and the EU General Data Protection Regulation (GDPR), the data controller is Uniqodo Limited of 1 Gayfere Place, Grange Hill, London SE25 6DY.
- 1.5 If you have any queries about how we process and protect your personal data, or wish to exercise any of your rights, please email us at [privacy@uniqodo.com](mailto:privacy@uniqodo.com) or call us on 0203 868 3830

### 2. INFORMATION WE MAY COLLECT FROM YOU

- 2.1 We may collect and process the following information about you:
  - (a) Information you give us. You may give us information about you by filling in forms on the Website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the Website, subscribe to our service, download or use an offer, voucher or other promotional material, participate in discussion boards or other social media functions on the Website, enter a competition, promotion or survey and when you report a problem with the Website. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information as well as any information about your business or that of your clients if you are acting as a retailer or publisher.
  - (b) Information we collect about you. With regard to each of your visits to the Website we may automatically collect the following information:
    - (i) 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, operating system and platform;
    - (ii) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time); offers, vouchers or another marketing material (the "Rewards") you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.

- (c) Information we receive from other sources. We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

### **3. COOKIES**

- 3.1 Our website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.
- 3.2 Our use of cookies is set out in the Cookies Policy.

### **4. USES MADE OF THE INFORMATION**

- 4.1 We use information held about you in the following ways:

(a) Information you give to us. We will use this information:

- (i) to carry out our obligations arising from any contracts entered into between you and us and in support of our legitimate business interest of providing you with the information, products and services that you request from us;
- (ii) to provide you with Rewards published to the Website and to tailor any such Rewards to your interests;
- (iii) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
- (iv) to enable you to take advantage of any Reward purchased on the Website;
- (v) to notify you about changes to our service; and
- (vi) to ensure that content from the Website is presented in the most effective manner for you and for your computer.

(b) Information we collect about you. We will use this information:

- (i) to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (ii) to improve the Website to ensure that content is presented in the most effective manner for you and for your computer;
- (iii) to allow you to participate in interactive features of our service, when you choose to do so;
- (iv) as part of our efforts to keep the Website safe and secure;
- (v) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and

- (vi) to make suggestions and recommendations to you and other users of the Website about goods or services that may interest you or them.
- (c) Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- (d) Information collected in the form of CVs. If you apply to work for Uniqodo, or simply send us a CV, we will only use the information you supply to us to process your application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Barring Services we will not do so without seeking your consent beforehand, unless the disclosure is required by law. Once you have taken up employment with Uniqodo, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with Uniqodo has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it. Where you have been unsuccessful in your application, we will keep your CV on file for a period of 3 months and then destroy it.

## **5. DISCLOSURE OF YOUR INFORMATION**

- 5.1 We may share your personal data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- 5.2 We may share your information with selected third parties including:
  - (a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - (b) advertisers and advertising networks that require the information to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
  - (c) retailers and publishers that require the information to enable any offer, voucher or promotional material to be verified and honoured;
  - (d) retailers and purchasers and third parties that require information in aggregated and anonymised form for the purposes of research and statistical analysis;
  - (e) analytics and search engine providers that assist us in the improvement and optimisation of the Website; and

- (f) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

5.3 We may disclose your personal data to third parties:

- (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- (b) if Uniqodo Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Website Use and other agreements; or to protect the rights, property, or safety of Uniqodo Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5.4 We may sell data derived from usage of the Website and views and downloads of Rewards which will always be in aggregated and anonymised form to customers, purchasers and retailers.

## **6. WHERE WE STORE YOUR PERSONAL DATA**

6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). In such cases, it will only be stored with a US company that is signed up to and protects personal information in accordance with the EU-US Privacy Shield. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the verification of any offer, voucher or other marketing material downloaded or used by you, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **7. RETENTION OF YOUR PERSONAL DATA**

7.1 We will not store your personal data in a form that allows you to be identified for longer than is necessary

- 7.2 As a client or other business contact, we will retain your personal data for as long as you are using our services or wish to remain in contact with us.
- 7.3 As an employee, we will keep your personal data on file for the duration of your employment. Following the end of your employment we will destroy all personal information apart from your name and start and end dates of your employment (to enable us to provide you with future employment references) or other such information as may be required to be kept on file by law.

## **8. YOUR RIGHTS**

- 8.1 **Right of access.** You have the right to access personal data held about you. Your right of access can be exercised in accordance with the Act. The Act requires that we provide you with a copy of your information free of charge (unless the request is highly complex or malicious, in which case we may charge a reasonable fee) and within one month of your request.
- 8.2 **Right to object.** You have the right to object to our processing of your personal data where it is carried out under the legal basis of our legitimate business interests. Where your rights override our legitimate business interests, we will be required to stop processing your personal data.
- 8.3 **Direct marketing.** You have the right object to your personal data being processed for direct marketing purposes. We will ask your permission (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by contacting us directly.
- 8.4 You have the right to have your personal data rectified in the event that it is incorrect or incomplete. If you believe that any of your information is not correct, and you are unable to rectify it yourself, please contact us using the details above and we will correct it for you.
- 8.5 **Right to erasure.** In certain circumstances you have the right to request that we erase all the personal data that we hold about you. This right applies where:
- (a) the personal data is no longer required for the purposes or which it was originally collected
  - (b) where we have relied on your consent to process your personal data and you have withdrawn that consent
  - (c) where we are relying on our legitimate business interests as our legal basis for processing your personal data, you object to that processing and there is no overriding legitimate interest to continue that processing
  - (d) we are processing your personal data for direct marketing purposes and you object to that processing
  - (e) your personal data has been collected or processed unlawfully
  - (f) it must be erased to comply with a legal obligation; or
  - (g) we are processing the personal data to offer information society services to a child under the age of 13

8.6 Right to restrict processing. You have the right to ask us to do nothing further with your information other than store it. This right applies where:

- (a) you contest the accuracy of the personal data and we are verifying its accuracy
- (b) the data has been processed unlawfully and you request restriction of processing, rather than erasure of your personal data
- (c) we no longer need your information, but you need us to keep it to establish, exercise or defend a legal claim
- (d) you object to our processing of your personal data and we are considering whether our legitimate grounds override your rights under the GDPR

8.7 You have the right to lodge a complaint with a supervisory authority. In the UK and Northern Ireland, this is the Information Commissioner's Office. You can find their details on their website, <https://ico.org.uk>

## **9. OTHER WEBSITES**

9.1 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.

## **10. CHANGES TO OUR PRIVACY POLICY**

10.1 Any changes we may 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.