

Privacy Policy May 25th ,2018

1. In this section we outline how we may process your personal data. All personal data we process falls into one or more of the following categories:

- Order data
- Date of birth data
- Transaction data
- Financial data
- Internal social data
- Usage data
- Communication data
- Enquiry data
- Digital marketing data
- CCTV

We may process your order data (""). The order data may include your name, billing address, delivery address, phone number and email address. The order data will be processed for the purposes of delivering your orders to you. The legal basis for this processing is the performance of a contract between you and us.

We may process your transaction data ("**transaction data**"). The transaction data may include information relating to your previous transactions, including purchases of goods or services. The transaction data may include your name, billing address, delivery address, telephone number, email address and purchase history. It may be processed for the purpose of supplying the purchased goods or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us.

We may process financial information ("**financial data**") you share with us. The financial data may include your encrypted card details (we can never see the full card details), name and billing address. The financial data may be processed for the purposes of processing your payment, speedy check-out, easy refunds and to prevent fraud. The legal basis for this processing is the performance of a contract between you and us.

We may process information that you post for publication on our website or app, such as wall posts or product ratings and reviews ("**internal social data**"). This internal social data is public, and may be processed for the purposes of enabling interaction on the website or app between customers. We may also use your posts or reviews in our marketing materials to help us tell other customers about our products and services. In instances where internal social data is stored in an unstructured format (such as free text reviews and wall posts) it is exempt from our

data retention rules, however may be deleted upon request. The legal basis for processing internal social data is consent.

We may process data about your use of our website or app, and reaction to our emails and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The sources of the usage data are our analytics packages (including, but not limited to Google Analytics) and email services providers. This usage data may be processed for the purposes of analysing the use of the website, emails and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

We may process information that you provide to us for the purpose of subscribing to our marketing communications and/or newsletters ("**communication data**"). The communication data may include your name, email address, postal address, phone number or marketing preferences. This communication data may be processed for the purposes of contacting you with service notifications, such as that your order has been processed, or contacting you with relevant offers and messages. The legal basis for this processing is performance of a contract for service notifications and legitimate interests for marketing communications.

We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). This enquiry data may be processed for the purposes of providing clarification, resolving issues or marketing relevant goods and/or services to you. The legal basis for this processing is the performance of a contract between you and us and to ensure we are responding to your enquiry.

We may process information that you provide to us for the purpose of improving our digital marketing ("**digital marketing data**"). We may use digital marketing data in a number of different ways: either to advertise our products and services to you on third party websites such as Facebook, or to advertise our products and services to similar customers (lookalikes) on third party websites such as Facebook. We may also use digital marketing data to exclude you from seeing advertisements from third party websites such as Facebook. The digital marketing data may include your name, email address, billing address, phone number, date of birth, gender, and the user ID of any social platforms you have connected with us on. The legal basis for this processing is our legitimate interests, namely providing better services and enhancing our customer base.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

Please do not supply any other person's personal data to us, unless we prompt you to do so. If you do share your friends' details with us, please ensure you have their authorisation.

2. Providing your personal data to others

We have never, and will never, sell any of your personal data to any third party – including your name, address, email address or credit card information. We want to earn and maintain your trust, and we believe this is absolutely essential in order to do that.

However, we may disclose your personal data with the following categories of companies as an essential part of being able to provide our services to you, as set out in this policy:

- To any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy
- to our insurers and professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice
- to companies approved by you, such as Facebook and other social media sites (if you choose to link your accounts to us)
- to companies that do things to get your book orders to you, such as warehouses, order packers and delivery companies
- to deliver exciting news and offers to you we will use postal printing and mailing, as well as email service providers

Financial transactions relating to our website, app and stores are handled by our card payment service providers and PayPal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data with law enforcement and fraud prevention agencies, so we can help tackle fraud or where such disclosure is necessary for compliance with a legal obligation to which we are subject, in order to protect your vital interests or the vital interests of another natural person, or in connection with the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3. Transfers outside of the European Economic Area

Your data could be processed by our staff working outside the EEA, in particular the United States of America and Australia. We will take all reasonable steps to ensure your information is treated securely and in line with this policy. You acknowledge that personal data that you submit for publication through our website, for example

reviews, may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

4. How long we retain your data

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

If you have registered on our website but not purchased from us, the length of time we will retain your data is dependant on whether you have opted into our marketing communications. If you have opted in, we will retain your data for 2 years from registration; if you have not opted in, we will retain your data for 30 days from registration.

Whilst you are an active customer (which, for the avoidance of doubt, means you have purchased from us) we will retain your data for as long as needed to give you the best possible customer service. We will anonymise your personal data 7 years after your last provided you have not interacted with us for 2 years. For the purposes of this policy, an interaction is defined as an identifiable website or app session, or contacting our contact centre. We will inform you before we anonymise your data and give you the option for us to retain your details in order to continue to serve you.

In all instances outlined above, the process of anonymising your data may take up to one calendar month.

In certain circumstances we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, to resolve disputes and enforce our agreements.

5. Your rights

You have a number of rights in respect to your personal data. We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights. You may exercise any of your rights in relation to your personal data by either emailing us on info@blinddatewithabook.com or calling us.

Right of access

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge. In order to fulfil this right we will ask for government registered ID to confirm your identity and, once this is received, will respond with the relevant information one calendar month from the date of your request.

Right to rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

Right to erasure

In certain circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure, such as where processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, or for the establishment, exercise or defence of legal claims. If you have entered into a transaction with us, we will keep a record of your personal data for seven years following the date of your last transaction with us. We will endeavour to respond to your request within one month, but if your request is complex or we receive a number of similar requests at the same time, it might take us longer, in which case we will inform you within one month of the receipt of the request and explain why we think an extension is necessary.

Right to restriction on processing

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: (a) you contest the accuracy of the personal data; (b) processing is unlawful but you oppose erasure; (c) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and (d) you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: (a) with your consent; (b) for the establishment, exercise or defence of legal claims; (c) for the protection of the rights of another natural or legal person; or (d) for reasons of important public interest.

Right to objection to processing

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: (a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or (b) the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless (a) we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or (b) the processing is for the establishment, exercise or defence of legal claims.

You also have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to data portability

In certain circumstances, you have the right to receive your personal information in a structured, commonly used and machine-readable format and to transmit that information to another controller to enable it to use the data. The right to data

portability applies (a) to personal data you have provided to us as data controller, (b) where the processing is based on the your consent or for the performance of a contract and (c) when processing is carried out by automated means. If you request this information, we will transmit the data directly to another controller, if this is technically feasible. We are, however, not required to adopt or maintain processing systems that are technically compatible with other controllers. Also, if the personal data concerns more than one individual, we must consider whether providing the information would prejudice the rights of other individuals.

In case you exercise your right to data portability, we will endeavour to respond to your request within one month, but if your request is complex or we receive a number of similar requests at the same time, it might take us longer, in which case we will inform you within one month of the receipt of the request and explain why we think an extension is necessary.

Right to stop marketing messages

At any time you can amend your marketing preferences to reduce, remove or increase the amount we contact you with special offers. You can do this by contacting us at info@blinddatewithabook.com or clicking the unsubscribe link in any our communications.

Right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time.

Right to complain

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at **info@blinddatewithabook.com** and we will endeavour to deal with your request as soon as possible. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. Our supervisory authority is the Information Commissioner's Office. You can contact them via <https://ico.org.uk/>.

6. Cookies

We use cookies on our website.

In common with most websites, **blinddatewithabook.com** uses "cookies". Cookies are small snippets of text that are stored on your computer. When you request a page from our website, the cookies are sent to our web server, and when we send a page back to you our server may add to or change these cookies. Without cookies, we would not be able to know that you are the same person from page to page.

We use cookies for a variety of reasons, such as remembering the contents of your basket. We also use analytics software, which allows us to track and measure patterns of behaviour so that we can improve our website.

Additionally, we have partnerships with some carefully chosen third party services which involve including some code on our website, for example so that we can measure the effectiveness of our marketing activities ,enable you to share content with your friends or login via a social media account. In some cases these partners may also store and retrieve their own cookies on your computer. Cookies set by websites other than blinddatewithabook.com are known as "third party cookies".

In accordance with the Directive on Privacy and Electronic Communications 2003 and General Data Protection Regulation 2018 (GDPR), and to be as open and transparent as possible, we have provided more information on the cookies in use on our website here. These details may change over time as we continue to develop our website.

You can change the settings in your web browser to allow or deny different websites from setting cookies.

7. Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

8. Data Protection Officer

If you have any concerns or questions about how we protect your privacy, please contact the team or Rory Schmitz at info@blinddatewithabook.com.