

# JollyRoger Limited

## Privacy Policy

### Protecting your privacy

#### 1 - What we collect:

- When you visit our website.
- When you make an online purchase.
- When you create an account with us and register online.
- When you purchase a product in store or by phone.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our staff members to email you information about a product.
- When you enter any prize draws or competitions.
- When you choose to complete any surveys we send you.
- When you comment on or review our products.
- When you fill in any forms. For example, if an accident happens in the showroom, a staff member may collect your personal data.
- When you've given a third party permission to share with us the information they hold about you.
- When you use our car parks and showroom which have CCTV systems operated for the security of both customers and staff. These systems may record your image during your visit and be used if required for any prosecution enforcements.

## **2 - 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 an item from us for delivery, we'll collect your address details to deliver your purchase, and pass them to our courier or delivery team.

### 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 the Jolly Roger Limited 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 may use your purchase history to send you or make available personalised offers.

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

We can 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 - What sort of data do we collect:**

- If you have a web account with us: your name, title, billing/delivery address, orders, invoices, payment details, receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.
- Details of your interactions with us through in the showrooms, offices, online or by phone.

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

- Details of your visits to our website and which site you came from to ours.
- Personal details which help us to recommend items of interest.

We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us.

- Payment information.
- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit the showrooms or car park.
- Your car number plate may be recorded at some of our car parks to manage parking restrictions.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

#### **4 - How and why we use your personal data:**

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section 9 below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

Here's how we'll use your personal data and why:

- To process any orders that you make by using our website or in the showrooms. If we don't collect your personal data during checkout, 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 or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil 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 can support with forgotten passwords if required, but we will never keep a password and only reset on your request and for you then the change it to something you would remember straight after being able to access your account. 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 protect our customers, premises, assets and staff from crime, we operate CCTV systems in our showrooms and car parks which record images for security. We do this on the basis of our legitimate business interests.

- 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.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- 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 office 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 policy, product recall notices, and legally required information relating to your orders. 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 process your purchase requests. Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or staff delivering to the desired destination). We do so to maintain our sale to you. Without sharing your personal data, we'd be unable to fulfil your request.

## **5 – How we protect your personal data:**

We know how much data security matters to all our customers. With this in mind 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 electronic personal data is password-protected, and sensitive data (such as payment card information) is secured to ensure it is protected. Any manual copies of personal data are stored in a secure office, locked and alarmed premises and are only accessed by staff that have a legitimate reason to and know how to.

Any payments details provided other than online, are manually destroyed after payment is successfully taken.

We regularly monitor our system for possible vulnerabilities and attacks.

#### **6 – How long 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.

Our customer data retention periods:

#### Orders

When you place an order, we'll keep the personal data you give us for seven years so we can comply with our legal and contractual obligations.

#### **7 – Who we share your personal information with:**

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

Here's the policy we apply to those 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.
- Direct marketing companies who help us manage our electronic communications with you.
- Google / Facebook for marketing purposes and would only be with your direct consent prior to use this information in this way.

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.
- For further information please contact our Data Protection Officer on [dpo@lifesize-models.co.uk](mailto:dpo@lifesize-models.co.uk).

## **8 – 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 Australia or the USA.

International orders

If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to our base in the UK.

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 Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## **9 – What are your rights over your personal data?**

An overview of your different rights

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.
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end.
- 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 a staff member 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 the company holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Data Protection Officer, JollyRoger Limited, St Johns Lane, Bovey Tracey, TQ13 9FF, or email [dpo@lifesize-models.co.uk](mailto:dpo@lifesize-models.co.uk). To ask for your information to be amended, please update your online account, or contact any of the team on 01626 833646.

If we choose not to action your request we will explain to you the reasons for our refusal.

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.

Direct marketing

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. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **10 – 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 Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 11.

## **11 – If you live outside the UK**

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data such as name, delivery address and contact number to be able to deliver the required purchased items to their final destination.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This will occur due to only have our main base and office located in the UK. We would therefore use couriers and delivery to fulfil our contractual obligations to provide the item(s) requested.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

If you are outside of the UK you may submit any questions, comments or complaints to our UK-based Data Protection Officer who will come back to you within 30 days.

If you are contacting us to complain about an alleged breach of this Privacy Notice or our legal privacy obligations, please provide us with as much detail as possible in relation to your complaint.

We will take every privacy complaint seriously and assess it with the aim of resolving all issues quickly and efficiently. We'd be grateful for your cooperation with us during this process by providing us with any relevant information that we made need.

#### Australia

If we have not come back to you within 30 days, or you are not happy with the response that you've received, you may submit a complaint to the [Office of the Australian Information Commissioner](#). (opens in a new window; please note we can't be responsible for the content of external websites.)

We are committed to keeping your personal information secure and will take all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.

Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

#### Canada

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 information, you have the right to lodge a complaint with the [Office of the Privacy Commissioner of Canada](#), (opens in a new window; please note we can't be

responsible for the content of external websites) or in some Canadian provinces, your local Privacy Commissioner.

## Hong Kong

If you are in Hong Kong you may submit a complaint to our UK-based Data Protection Officer who will come back to you within 30 days. If we have not come back to you or you are not happy with the response that you receive, you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

## 12 – Any questions:

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at [dpo@lifesize-models.co.uk](mailto:dpo@lifesize-models.co.uk)
- Or write to us at Data Protection Officer, JollyRoger Limited, St Johns Lane, Bovey Tracey, Newton Abbot, TQ13 9FF.

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