

Privacy Policy

- Peter Jones (ILG) Limited (Personal Mail Order)

Peter Jones (ILG) Limited is committed to protecting the privacy and security of your personal information. This policy explains the types of personal information that we may collect and hold about you, how that information is used and with whom the data is shared. It also details how you can contact us if you have any queries or concerns about this information. We will notify you of any significant changes to how your personal information is used, but also recommend that you review the contents of our Privacy Policy regularly.

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1. Who we are

In this Privacy Policy, "we", "us" and "our" refers to Peter Jones (ILG) Limited, company number 01131693), registered at Unit 1, Monk Street Industrial Estate, Lower Monk Street, Abergavenny, Monmouthshire, NP7 5LU.

We will collect and process personal information in accordance with the General Data Protection Regulation EU 2016/679 (GDPR), Data Protection Act 2018 and The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) ("the Data Protection Regulations"). For the purpose of the Data Protection Regulations, the Data Controller is Peter Jones (ILG) Limited.

For the purposes of this Privacy Policy, "Personal Information" consists of any information that relates to an identified or identifiable individual (such as you). For example, information which identifies you may consist of your name, address, telephone number, email address, photographs, payment details, an online identifier (e.g. cookies and your IP address). Information which does not identify you on its own but that we link to you also qualifies as personal information.

This Privacy Policy applies to:

- Peter Jones (ILG) Limited's Personal Mail Order website (www.leather-police-equipment.co.uk), other webpages and communications linking to this policy;
- When you contact us by email, telephone, fax, post or in person;
- When you post content or contact us through Social Media;
- When you purchase products and services via this website, telephone, email, fax, post or in person.

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2. Personal information that we collect

Peter Jones (ILG) Limited may collect personal information about you in several different ways.

2.1 Information that you provide us

Whenever you interact with Peter Jones (ILG) Limited, you may be asked to provide us with information relating to you. For example:

When you purchase a product from us, whether via this website, by phone, email, fax, post, or in person, we will collect certain personal information such as your title, name, billing address, email address, telephone number, mobile number, delivery contact details, and payment card details, so that we can process and fulfil your order;

When you contact our sales/customer service department (e.g. via email, telephone, fax, post or in person) to make an enquiry, request a quotation or for general assistance, we will keep information about the communication, including your title, name, address, telephone number, email address, product(s)/service(s) you enquired about, the reason why you contacted us and the advice/information we gave you;

When you visit us at a public event, such as a trade show/exhibition or participate in one of our surveys, competitions or prize draws, we may ask for information, such as your title, name, address, telephone number, email address and product or service interests/preferences.

2.2 Information we may collect from other sources

We may also collect information from publicly available sources and third parties, provided the receipt of such information is in accordance with applicable laws. We may combine such information with other information we receive from or about you. For instance, when you seek to open an account with us, we may carry out credit and financial checks to ensure that you have a suitable credit rating.

2.3 Information we may collect in relation to social media platforms

If you use any of our social media pages e.g. Twitter, LinkedIn, Facebook, Google+, SlideShare or YouTube channel, we may receive information relating to your social media accounts.

For instance, if you 'like', '+1' or similar one of our pages on a social media site, we may receive information about your social media profile, depending on your social media account privacy settings.

Communication, engagement and actions taken through external social media platforms on which we participate are subject to the terms and conditions as well as the privacy policies held with each respective social media platform. For details about how you can control access to your social media profile, you should view the Privacy Policy and other guidance available on your social media website.

We will never ask for personal or sensitive information through social media platforms and encourage you to contact us through primary communication channels such as telephone or email, if you wish to discuss sensitive details.

Read more about social media platforms' privacy policies by clicking the following links:

Facebook Privacy Policy

Twitter Privacy Policy

<u>LinkedIn Privacy Policy</u>

SlideShare Privacy Policy

Google+ and YouTube Privacy Policy

2.4 Information we may collect when you use the Peter Jones (ILG) Personal Mail Order website (http://www.leather-police-equipment.co.uk) and other online facilities

Our website provides Peter Jones (ILG) Limited with information about your use of the site, including server logs, which hold information about your use of our website, such as your IP address, browser information, HTTP client request information and the time and location of your activities and domain.

Peter Jones (ILG) Ltd. works in conjunction with third party, PayPal, to fulfil eCommerce transactions. Certain cookies are set on our website by PayPal to allow you to add items to your shopping cart, to keep you logged in to your shopping account and to make a payment.

Email communication you have with us may be monitored and logged.

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3. How we use the information that we collect

Peter Jones (ILG) Limited may use the information it collects for the following purposes:

3.1 Service provision

When we use personal information to offer our products and services to you, the processing is based on an agreement between you and Peter Jones (ILG) Limited. In this context, we may use personal information to:

Provide you with a product or service you have requested, including checking that a payment is not made fraudulently and delivering your purchase to you;

Provide customer care, warranty, returns and other after-sales services (such as complaint handling);

Facilitate and process your requests for information when you contact us about Peter Jones (ILG) Limited and its products and services.

3.2 Product and service development

We work continuously to improve our products and services. We base this processing on our legitimate interests to develop our products and services to better meet customer requirements. In this context, we may use personal information to:

- Ask for your opinions on Peter Jones (ILG) Limited's products and services and conduct product surveys;
- Develop and improve new and existing Peter Jones (ILG) Limited products and services.

3.3 Marketing

When we use personal information for marketing purposes, we either base the processing on our legitimate interests to understand our customers, keep you up-to-date about Peter Jones (ILG) Limited's latest products and services, or on your prior explicit consent, e.g. when you sign up to receiving our e-newsletters or to joining our marketing mailing list.

We may use your information to:

- Provide you with newsletters and other communications by post or email, if you have provided your prior consent or if you have purchased or enquired about purchasing from us a similar product or service that the e-newsletter/communication relates to.
 See the Marketing communications section below for further details;
- Conduct prize draws, competitions and other promotional offers;
- Publish or promote elsewhere any product/service reviews, comments or content you have uploaded to our website or to any social media pages that are publicly visible to link to.

3.4 Security

We may use information collected from monitoring our website and emails for security purposes, e.g. to prevent spam or to prevent or stop an attack on our systems and networks. This information may be passed to the police or to other appropriate authorities. We base this processing on our legitimate interests to protect you and our company, systems, employees and partners, or on a legal obligation to cooperate with competent authorities.

3.5 Fraud prevention and investigation

We may also use personal information to comply with applicable laws, regulations and court orders and to comply with valid legal information requests from such bodies. We may use your personal information to enforce or defend the legal rights of Peter Jones (ILG) Limited or the terms and conditions of any Peter Jones (ILG) Limited product or service. In this case, we base the processing on a legal obligation to which Peter Jones (ILG) Limited is subject or on our legitimate interest to defend our legal rights.

Please note that when we process your personal information for legitimate interests, we will ensure that we consider and balance any impact upon you and your rights under the Data Protection Regulations.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used, if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

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4. Sharing information about you

4.1 Sharing of information by Peter Jones (ILG) Limited

Peter Jones (ILG) Limited will not disclose your personal information to third parties for their own independent marketing or business purposes without your consent. However, we may disclose your personal information to the following:

4.1.1 Our third-party service providers

We may use third-party service providers (as data processors) to process information on our behalf for the purposes outlined above. For example, for delivering packages, sending postal mail and emails, tracking effectiveness of our marketing campaigns, providing marketing assistance (e.g. market research), administering our website, managing our internal Information and Communications Technology (ICT) systems, processing credit card payments, checking credit ratings.

Our service providers operate only in accordance with our instructions, in line with this policy, and are subject to appropriate confidentiality and security obligations. Examples of third-party service providers we use include:

• **Email Marketing Services (EMS) providers** – we use web-based MailChimp and MailJet to assist us in sending emails to you in accordance with your marketing preferences.

We may hold the following information about you within our EMS systems:

- name
- email address
- IP address
- subscription time and date

All personal details relating to subscriptions and email marketing campaigns are held securely and in accordance with Data Protection Regulations.

Read more about their privacy policies by clicking the following links:

MailChimp Privacy Policy MailJet Privacy Policy

• **ICT Service Providers** – we use external ICT service providers to monitor and support our ICT servers and ICT security, to provide web hosting and to supply and support our database software.

4.1.2 Legal and business purposes

We may use and/or disclose information about you to third parties such as:

- Government bodies and law enforcement agencies to prevent fraud, to comply with the law and to meet a reasonable request from such bodies;
- Professional advisors and other agencies to enforce or defend the legal rights of Peter Jones (ILG) Limited or the terms and conditions of any Peter Jones (ILG) Limited product or service;
- A third-party purchaser or seller, and its and our professional advisors, in connection with a corporate event such as a merger, business acquisition or insolvency situation.

4.1.3 Anonymous statistics

We may prepare anonymous, aggregate or generic data (including "generic" statistics) for several purposes as outlined above. We believe that you cannot reasonably be identified from this information, therefore we may share it with any third party (such as our partners, industry bodies, the media and/or the public).

4.2 International transfers of your information

Peter Jones (ILG) Limited is a UK-based business providing services across Europe and worldwide.

Your personal information is predominantly stored and processed within the European Economic Area (EEA) in line with related Data Protection Regulations.

In limited cases, we may transfer personal data that we collect from you to third-party data processors based in the US. When we transfer personal information to these third parties, we rely on the EU-US Privacy Shield, which imposes stronger obligations on US companies to protect Europeans' personal data. The Privacy Shield requires the US to monitor and enforce more robustly and to cooperate more with European Data Protection Authorities.

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5. Marketing communications

When you provide us with contact details, such as when you purchase a product or contact our sales and customer services department, you may be given the opportunity to opt-in to (or in certain cases where applicable law allows, opt-out of) receiving various newsletters and other communications by post or email from Peter Jones (ILG) Limited. These communications may include, for instance, details about Peter Jones (ILG) Limited's latest products and services, including improvements, special offers and industry events such as trade fairs and exhibitions in which you may be interested. We may (based on our legitimate interests) contact you without your prior consent, if the marketing communication relates to similar products and services that you have previously purchased or enquired about purchasing.

You can change your marketing communication preferences at any time:

- If you would like to unsubscribe from an email sent to you, follow the 'unsubscribe' link and/or instructions usually placed at the bottom of the email. Please note, however, that:
 - If you use more than one email address to purchase with or to contact Peter Jones (ILG) Limited, you will need to unsubscribe separately for each email address;
 - This method will only unsubscribe from newsletters or other communications that you have received. You should contact us using the details in the "Contact us" section below to opt-out of all our marketing communications or to change your marketing communication preferences.

Please note that we may occasionally send you important information about Peter Jones (ILG) Limited products and services that you are using or have used (such as order confirmations, product safety announcements and service changes). These emails are not affected by your marketing communication preferences.

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6. Security of your information

Peter Jones (ILG) Limited has put in place appropriate physical and technical measures to protect your personal information from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, including where appropriate:

- Using Secure Sockets Layer (SSL) encryption when collecting or transferring sensitive information, such as credit card details (SSL encryption is designed to make the data unreadable by anyone but us);
- Limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access);
- Putting in place physical, electronic, and procedural safeguards in line with industry standards.

We have been assessed as complying with the government-backed Cyber Essential Scheme. At the time of testing, our ICT defences were assessed as satisfactory against a commodity-based cyber-attack.

Please note, that although we take appropriate steps to protect your personal information, no website, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your personal information.

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7. Cookies and web beacons

Our website uses industry-wide technologies, such as "cookies" and "web beacons", to enable it to work as you would expect. The cookies used on this website are strictly necessary for the website to function and cannot be switched off in our systems. They are set in response to actions made by you, such as adding items to your shopping cart, keeping you logged in to your shopping account and making payments.

You can modify your browser so that it notifies you when cookies are sent to it. If you do not want to receive cookies, you may refuse cookies altogether by activating the relevant settings on your browser. Please note that if you choose to refuse all the cookies, some features of the website may not be accessible to you or not work properly e.g. PayPal's E-Commerce facility. Finally, you can also delete cookies that have already been sent.

More information about our use of cookies (including third-party cookies) on this website can be found in our <u>Cookie Policy</u>.

Email marketing messages that we send may contain tracking beacons/tracked clickable links or similar server technologies to track your activity within email marketing messages. Such marketing messages may contain a range of data such as times, dates, IP addresses, opens, clicks, forwards, geographic and demographic data. This information is used to refine future email campaigns and supply you with more relevant content, based around your activity.

8. Your information rights

You have several rights in relation to your personal information that you can choose to exercise at any time. We have provided a basic overview of those rights below:

8.1 Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. You can read more about your right of access here.

8.2 Your right to rectification

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about your right to rectification here.

8.3 Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. You can read more about your right to erasure here.

8.4 Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances. You can read more about your right to restriction of processing here.

8.5 Your right to object to processing

You have the right to object to processing if we can process your personal information because the process forms part of our public tasks or is in our legitimate interests. <u>You can read more about your right to object here.</u>

8.6 Your right to data portability

This only applies to personal information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or to give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. You can read more about your right to data portability here.

You are not required to pay any charge for exercising your rights. We have 30 days to respond to you from receipt of a written request from you regarding the exercise of your rights.

If you would like to exercise any of the above rights regarding the information held on you, please contact us using the **Contact us** details shown at the bottom of this policy.

If you feel that your personal information has not been handled correctly or you are unhappy with any response from us, you have the right to lodge a complaint with the Information Commissioner's Office (the UK regulator responsible for data protection). The contact details can be found at http://www.ico.org.uk or you can call **0303 123 1113**.

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9. Retention of personal information

We will only retain your personal information for as long as is reasonably necessary for the various purposes set out in this policy or to otherwise comply with any applicable laws and regulations concerning the mandatory retention of certain types of information. When your personal information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted in accordance with applicable law.

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10. Third-party links to other sites

Our website, emails and social media pages may contain links to other third-party websites that are not operated by Peter Jones (ILG) Limited.

While Peter Jones (ILG) Limited tries to link only to safe and relevant sites that share Peter Jones (ILG) Limited's high standards and respect for privacy, we are not responsible for the content, security or privacy practices of any externally linked websites. We strongly recommend that you take the time to review the privacy and cookie policies of any third parties to which you provide personal information, to find out how your information may be used.

When we share web links on our social media platforms or emails, we may use Bitly to shorten lengthy URLs (web addresses) e.g. http://bit.ly/2QmOVZI. Using shortened URL links also allows us to measure the number of daily clicks on the links, the top referring digital channels (e.g. social media platforms) and the top countries users clicking the links come from.

You should note that you click on external links and shortened links at your own risk and we cannot be held liable for any damages or implications caused by visiting any external links or shortened links mentioned. Despite our best efforts to ensure only safe and genuine URLs are published, many social media platforms are prone to spam and hacking.

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11. Children's privacy

Peter Jones (ILG) Limited considers a child to be anyone under the age of 13. We do not knowingly seek or collect personal information from or about children without the consent of a parent or guardian.

If we become aware that personal information that has been submitted to us relates to a child without the consent of a parent or guardian, we will use reasonable efforts to:

- Delete that personal information from our files as soon as possible;
- Ensure, where deletion is not possible, that this personal information is not used further for any purpose, nor disclosed further to any third party.

Any parent or guardian with queries regarding our processing of personal information relating to their child should contact us using the details provided in the **"Contact us"** section.

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12. Changes to this Privacy Policy

Peter Jones (ILG) Limited may change this Privacy Policy from time to time. The "Date last updated" at the bottom of this page states when the policy was last updated, and any changes will become effective upon our posting of the revised Privacy Policy.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this policy by email or by posting notice of the changes on this website.

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13. Contact us

If you need further assistance, you can contact us on:

Data Privacy Manager Peter Jones (ILG) Limited Unit 1, Lower Monk Street Abergavenny Monmouthshire, NP7 5LU United Kingdom

Email: sales@peterjonesilg.co.uk

Tel: + 44 (0) 1873 852742

(9am to 5pm, Monday to Thursday (offices closed for lunch between 12.30pm and 1.30pm); 9am to 12.30pm, Friday).

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Date last updated: 5th October 2018