# **AB-Presents Privacy Notice**

# PLEASE READ THIS NOTICE CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT HOW WE PROCESS YOUR PERSONAL INFORMATION

# WHO WE ARE AND HOW WE APPROACH DATA PRIVACY

We are Aspects Beauty Company Limited (Company Registration No. 02882953, Registered Office: Railview Lofts, 19c Commercial Road, Eastbourne, East Sussex, BN21 3XE).

Our use of your personal information is regulated under the General Data Protection Regulation (Regulation (EU) 2016/679)) for as long as the United Kingdom is a member of the European Union or is subject to any transition arrangements after leaving the European Union, the Data Protection Act 2018 and any other privacy related laws or regulations the UK may implement as a result of it leaving the European Union. We are responsible as "Controller" for the purposes of those laws.

As a company we are committed to protecting and respecting the privacy of your personal information. We want you to be confident that your information will be properly protected whilst in our possession.

This notice, together with our <u>Website Terms</u> and, where you purchase products from us, our <u>Terms and Conditions of Sale</u>, explain how we, and carefully selected third parties we work with, will collect and use the personal information of our customers, suppliers, business contacts, prospects and users when you access our Site or where we otherwise collect personal information from you including when you visit our place of business. If this describes you, please read this notice carefully and make sure you're comfortable with the content.

If you have any questions about our use of your personal information, or you wish to exercise one of your rights under data protection legislation, please contact us. A summary of your rights is detailed in this notice.

#### **OUR WEBSITE**

This notice details how we use information you provide to us, including through the "Contact" function on our website (<a href="https://ab-presents.co.uk/">https://ab-presents.co.uk/</a>) referred to in this notice as our **Site**.

The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy notice of every website you visit.

Unfortunately, the transmission of information through the internet is never completely secure. Although we do our best to protect your personal data at all times, we cannot guarantee the security of the data you send to us through our Site. Any transmission made is therefore at your own risk. Once we have received your information we use strict procedures and security features to protect against unauthorised access.

# **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your express consent. In situations where we do rely on your consent to process your personal data, you have the right to withdraw consent at any time by contacting us at <a href="mailto:privacy@ab-presents.co.uk">privacy@ab-presents.co.uk</a> / 01273 408 800.

# INFORMATION WE COLLECT FROM YOU AND THE PURPOSES FOR WHICH WE WILL USE IT

We hope the following table helps you to understand what information we may collect, in what circumstances and how we use that information (including how long we retain it for).

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
Information you give to us (Voluntary information from direct interactions)	This is information you give to us about you by:		
	Purchasing our products, including processing and delivering your order	<ul> <li>Name</li> <li>Address</li> <li>E-mail address</li> <li>Telephone number</li> <li>Payment information</li> <li>It is necessary for us to obtain and process this information in order to enter into, and perform, our contract with you to provide our products.</li> </ul>	7 years from the date you enter into our contract with you.
	Registering with our Site or completing a user registration form	<ul> <li>Name</li> <li>Address</li> <li>E-mail address</li> <li>Telephone number</li> <li>Gender</li> <li>Your nearest retailer</li> <li>It is necessary for us to obtain and process this information in order to create and deliver to you communications containing product information, cosmetic tips, promotions or product samples.</li> <li>When we collect this information, we obtain your consent.</li> </ul>	We only keep personal data of individuals for a period of 24 months after you last made contact with us.
	Contacting us with an enquiry or to report a problem with our products, services or our Site.	In order to process your enquiry and/or investigate a problem we may ask you to provide contact information (such as name, address, telephone number, email address.  We will only use your personal information to investigate and respond to you.  You do not have to provide this information to us, it is entirely voluntary. However, we may be limited in our ability to respond to you if contact information is not provided. We will only correspond with you in the way you have asked us to.  It is in our legitimate business interests to process this information in order to deal with	We will keep this information for 24 months after you last made contact with us.  Access to this information will be restricted on a "need to know" basis.

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
		your enquiry/investigate the problem you've raised.	
	Business contact information.	a record of business contacts of our suppliers, advisers, agents and clients and their contact information in order to manage our commercial relationship with that third party and perform contractual obligations (i.e. it is necessary for us to perform a contract); and     a record of prospective business contacts. This is in our legitimate business interests (i.e. we have a justifiable reason for processing information in this way).	We will keep this information for seven (7) years from the end of the commercial arrangement. We will keep this information for two (2) years from last point of contact.
	Being a former employee or worker of ours.	We will retain your personal data after your employment or engagement in accordance with our separate Privacy Notice for Employees and Workers. Please contact us at <a href="mailto:privacy@ab-presents.co.uk">privacy@ab-presents.co.uk</a> if you would like a copy of this Privacy Notice.	As set out in our Privacy Notice for Employees and Workers.
Information we collect about you and your device (automated technologies or interactions)	Each time you visit our website we will automatically collect the following information:  • technical information, including your operating system, the browser you use (Device Information); • details of your use of our website including traffic data, the resources you use, where you have clicked through to our website from that of a third party, the domain name of the connecting website (Log Information).	Some online identifiers (such as static IP addresses) are your personal information.  We collect Device Information so that we can ensure adequate technical support for our Site and ensure it is functioning properly on all operating systems/browsers. We want to ensure the content of our Site is being presented to you in the most appropriate way to ensure it is easy to use/navigate. We also need this information in order to allow you to participate in interactive features on our Site where you chose to do so.  We collect Log Information so that we can better understand how our Site is used and improve its functionality/content. We want to provide you with a customised service.  Your Device Information and Log Information will be combined with that of our other users and reported back to our advertisers in statistical form. It will not be possible to identify you from this aggregated information.  These activities are in our legitimate business interests (i.e. we have a justifiable reason for processing your information in this way).	We will keep this information for 12 months from your last interaction with our website.

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
		We also place a "cookie" on your computer's hard drive so we can gather data about your visit to the Website, including how many and which pages you visited and whether you requested a sample. A cookie is a piece of data that enables us to track and analyse what you have been interested in on the Website. The cookie will be stored on your computer's hard drive for 30 days unless you remove it earlier. At the end of 30 days, it will automatically delete itself.  You can have your browser notify you of, or automatically reject, cookies. If you reject our cookie, you may still use our Website, but you may be limited in the use of some of the features.	

You can find details on each cookie we use, how long it lasts and what we use it for, on the cookie consent bar under preferences.

# Do I have to provide this information?

In most cases the personal information you provide to us in the table above is entirely voluntary. You are not under a statutory or contractual obligation to provide it to us.

However, where we need to collect personal data under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products). In this case, we may have to cancel an order have made with us but we will notify you if this is the case at the time.

#### PROVIDING US WITH PERSONAL INFORMATION OF ANOTHER PERSON

If you need to provide us with personal information about another person you must obtain that individual's **express consent** to pass us their information. You should share this notice with those individuals as it may also apply to them.

# **MARKETING**

## Promotional offers from us

We may use your personal data to form a view on what products may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## Unsubscribe

You can ask us or third parties to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you or by emailing us at <a href="mailto:privacy@ab-presents.co.uk">privacy@ab-presents.co.uk</a> at any time.

#### **AUTOMATED DECISION-MAKING**

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We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

#### **DATA SHARING**

# Why might you share my personal information with third parties?

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Any group or associated company to which we provide any of our services;
- Carefully selected third parties, who provide a service to us to support our core operations, such as:
  providing our logistics and courier services, processing our mail, communicating with customers and
  prospective customers on our behalf (including via social media), running promotions, providing IT
  systems and administrative services and the development and improvement of internal systems and
  processes;
- Other organisations where we are legally obligated to disclose your personal information (such as requests made in the prevention and detection of crime) or where disclosure is necessary to protect the property, rights and safety of us and our staff;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice:
- Other companies where we are trialling products and services which we consider may improve our offering to customers and/or our business processes; and
- Other third parties where you have given your express consent or where we reasonably believe a third
  party is acting on your behalf.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

# **International Transfers**

The data that you provide to us as set out above may be transferred to, and stored at, a destination outside of the United Kingdom or where relevant the European Economic Area (EEA) by us and/or by the carefully selected third parties we work with.

We and third parties we work with may use cloud platforms to store your personal information. A cloud is a network of remote servers hosted on the internet. We will only use state of the art cloud platforms which give adequate guarantees that your personal data is secure. We will treat the storage of your personal information to the same level of protection as we treat our commercial information.

Where your data is held outside of the United Kingdom, or where relevant the EEA, on a cloud or otherwise transferred, we will ensure this is only to a country which has been deemed adequate by a competent data protection regulator or where adequate protections have been put in place to safeguard the data (to the standards prescribed by law). This includes contractual protections.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

All information you provide to us is also stored on our secure servers.

To find out more about storage of your data, and the safeguards that are in place to protect your data outside of the United Kingdom and the EEA, please contact our Data Privacy Representative whose details you can find below.).

# **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

# Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This
  enables you to receive a copy of the personal information we hold about you and to check that we are lawfully
  processing it.
- Request correction of the personal information that we hold about you. This enables you to have any
  incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal
  information where there is no good reason for us continuing to process it. You also have the right to ask us to
  delete or remove your personal information where you have exercised your right to object to processing (see
  below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend
  the processing of personal information about you, for example if you want us to establish its accuracy or the
  reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email <a href="mailto:privacy@aspectsbeauty.net">privacy@aspectsbeauty.net</a>.

# No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

# What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

# Time limit to respond

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep

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you updated.

# **DATA PRIVACY REPRESENTATIVE**

We have appointed a Data Privacy Representative to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact us by calling 01273 408 800 or emailing <a href="mailto:privacy@ab-presents.net">privacy@ab-presents.net</a>.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

# **CHANGES TO THIS NOTICE**

We keep this notice under regular review. Any changes we make to this notice will be posted on our Site with a prominent notice and, where appropriate, we will notify you by email.

If, in the future, we wish to use your personal information in a way not set out in this notice we will notify you and seek your permission to do so.

# **CONTACT US**

If you would like to request further information about this notice or the way in which we handle your personal information, please contact us at: Balneath Manor, South Chailey, Lewes BN8 4AP.