



Privacy Policy

INTRODUCTION

Clintons respects your privacy and is committed to protecting your personal data.

This privacy notice sets out to how we look after your personal data whenever that information is provided to us. [This includes when you request information from us, contact us (or we contact you), buy products [or services] from us, use our websites (including clintoncards.co.uk, clintonsretail.co.uk, and any other websites we may operate from time to time) ("Websites") or apps, [connect with us via social media], link to or from our website(s), or visit our shops]. It also tells you about your privacy rights and how the law protects you. It has been updated to reflect the new and additional requirements of the General Data Protection Regulation ("GDPR").

This policy should be read along with our applicable terms and conditions of website use and our cookie policy. Terms & Conditions of Use can be found here www.clintonsretail.com/about/terms-and-conditions. Our Cookie policy can be found here www.clintonsretail.com/about/cookie-policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice provides information on how Clintons collects and processes your personal data in our dealings with you, including in providing goods and services to you, and including any data you may provide through the Websites.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

AG Retail Cards Limited, trading as Clintons, ("Clintons", "we", "us") is the controller of your personal data and responsible for our Websites.

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance, using our contact details at the end of this privacy policy.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This privacy notice was last updated on 21st May 2018. We will update this privacy notice from time to time, and will notify you of any significant changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website 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 website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes (first name, last name, username or similar identifier).
- **Contact Data** includes [billing address, home address, email address and telephone numbers].
- **Financial Data** includes payment card details [and information held by credit reference and fraud prevention agencies].

- **Transaction Data** includes details about products [and services] you have bought from us and when you have requested information or raised queries.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website/or any apps.
- **Profile Data** includes your username and password, products/services bought by you, queries, feedback and survey responses.
- **Usage Data** includes information as to how you use our website.
- **Marketing and Communications Data** includes your preferences as to whether you are happy to receive marketing from us and, if so, your communication preferences.

[We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.]

In the normal course, we will not collect or process **special categories of personal data** about you, for example health, or racial or ethnic origin. If we ever do, we will make sure that we have your consent or another lawful basis to process it.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or 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 goods or services). In this case, we may have to cancel a contract you have with us, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect data from and about you in different ways, including through:

- **Your direct dealings with us.** You may give us your [Identity and Contact Data] by filling in forms or by corresponding with us by post, phone, email, via this website, apps or on social media, or otherwise. This includes personal data you provide when you :
 - subscribe to our newsletter;
 - request a brochure or other promotional or marketing materials to be sent to you;

- join our Rewards Scheme, or exercise membership rights;
- register on our Websites;
- buy products [and/or services] at one of our stores;
- buy products [and/or services] via our website;
- enter a competition, or respond to a promotion or survey; or
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our Websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. Please see our cookie policy for further details.
- **Third parties.** We may receive personal data about you from some third parties
 - [Technical Data from analytics providers [such as Google based outside the EU]
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as Sagepay based inside the EU].

4. 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 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.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you.

You have the right to withdraw consent at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to an enquiry from you.	(a) Identity (b) Contact	Necessary to take steps at your request prior to entering into a contract with you.
[To undertake credit-referencing and anti-fraud checks in connection with applications for and the operation of a credit account with us.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to take steps at your request prior to entering into a contract with you. Necessary for our legitimate interests in protecting our business from fraud. Necessary for means of substantial public interest (preventing fraud).]
To provide products [and/or services] to you, take payment for them, and to keep records of our dealings with you.	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you Necessary for our legitimate interests (to operate our business and obtain payment).
To operate our Rewards Scheme, and process details of your purchases through it.	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you. Necessary for our legitimate interests in operating our business.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy or to our Rewards Scheme (b) Asking you for feedback, by leaving a review or taking part in a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to understand how customers use our services, what they think of our products, and how we can improve them)

Where you have agreed to receive it, to provide our newsletter/marketing materials/ promotions	(a) Identity (b) Contact (c) Profile (d) Marketing & communications (e) Usage	Your consent
To run competitions, events or prize draws or other promotions	(a) Identity (b) Contact (c) Profile (d) Marketing & communications	When on our Websites, necessary for our legitimate interests in promoting our products and business. If we send details of the competition to you, your consent.
To administer and protect our business including our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness/ usability of our website	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how customers use our websites and services, to develop and improve them)
To use data analytics to improve our websites, products, services, marketing and customer relationships	(a) Technical (b) Usage	Necessary for our legitimate interests (to understand customers for our products/ services, to keep our website updated and relevant, and to develop and grow our business)
To deal with issues, complaints or disputes arising out of our relationship with you/your business, and to prevent or detect crime, including fraud	(a) Identity (b) Financial (c) Technical (d) Profile (e) Usage	Necessary for our legitimate interests. Necessary to establish, exercise or defend legal claims

When we refer to legitimate interests we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We do not undertake automated decision making using your personal data.

MARKETING/PROMOTIONAL OFFERS

Where you have agreed to receive marketing communications, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which goods, services and offers may be relevant for you.

We will only share your personal data for marketing purposes in accordance with your preferences/consent.

You can ask us to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you, or by contacting us at any time].

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please visit www.clintonsretail.com/about/cookie-policy.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of parties set out below for the purposes set out in the table in paragraph 4 above.

- Credit card companies and other payment providers;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our services and website;
- Professional advisers, including lawyers, banks, auditors and insurers;

- HM Revenue and Customs, regulators and other authorities;
- Organisations involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management and dispute resolution.
- Third parties 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.

Where these third parties are our processors, we require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party processors 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. Some of the third parties mentioned above, for example many professional advisers and HM Revenue and Customs, are controllers who, like us, are subject to specific obligations under data protection law, and who will have their own privacy notices setting out how they deal with personal data.

6. INTERNATIONAL TRANSFERS

Though we do not seek actively to transfer personal data outside the European Economic Area ("EEA"), some of the external third parties we deal with are based outside the EEA or process personal data outside the EEA, so their processing of your personal data will involve a transfer of data outside the EEA.

[Whenever we transfer your personal data out of the EEA, we look to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

[Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.]

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. Processors we appoint will only

process your personal data on our instructions and they are subject to a duty of confidentiality.

[You should be aware, however, that transmission of information via the internet is not completely secure.]

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

[Details of retention periods for different types of your personal data are available in our retention policy which you can request from us by contacting us].

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [*\[Request access to your personal data\].*](#)
- [*\[Request correction of your personal data\].*](#)
- [*\[Request erasure of your personal data\].*](#)
- [*\[Object to processing of your personal data\].*](#)
- [*\[Request restriction of processing your personal data\].*](#)
- [*\[Request transfer of your personal data\].*](#)
- [*\[Right to withdraw consent\].*](#)

If you wish to exercise any of the rights set out above, please email us at [**dp@clintonsretail.com**](mailto:dp@clintonsretail.com)

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to enable us to deal with your request or to speed up our response.

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

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. If we are not be able to comply with your request for erasure for specific legal reasons, we will tell you at the time of your request.
- **Object to processing** of your personal data where we are relying on our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have

objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10. MONITORING

We may monitor and/or record:

- (a) telephone calls;
- (b) transactions [and activities at all points of contact];
- (c) web, traffic and activities

These are to ensure that we carry out your instructions accurately, for training purposes and to improve our services, and to ensure security and prevent fraud. For the greater security of our customers and staff, and to prevent and detect crime, we use CCTV in and around our stores and other premises. [You may contact us to obtain information about our use of CCTV.]

11. CHILDREN

Customers need to be over 16 to register with our Websites or to sign up for our newsletter, and must be over 18 to take part in competitions, prize draws or other promotions. We will not knowingly collect data about under 16s, and if you are under 16, please do not provide us with your personal information. We would ask parents please to ensure that their children under 16 do not provide us with personal information without your permission. If you believe that a child who is under 16 has provided personal data to us, please contact us, using the details below, and we will seek to delete that data from our systems.

12. CONTACTING US

If you have any queries, comments or requests about this Privacy Policy, you have a complaint or you would like to exercise any of your rights set out above, you can contact us in the following ways:

- By email at dp@clintonsretail.com
- By post to: Clintons Website Data Protection Query
The Crystal Building, Langston Road
Loughton, Essex, IG10 3TH