

SANDHILLS EAST LTD PRIVACY POLICY

Any reference to **we** or **us** in this Privacy Policy shall mean Sandhills East Ltd, Luxembourg Branch which is a private limited company registered with the Luxembourg Trade and Companies Registered with registration number B167113 and have our registered office at Eagle Building, 6 Rue Lou Hemmer, Senningerberg, L-1758, Grand Duchy of Luxembourg.

Our Privacy Policy is regularly reviewed to ensure that we continue to respect your privacy. We take great care of any personal data that you give us, and in the following paragraphs we set out how any personal data you give us is processed.

This Privacy Policy applies to the [Brands](#) and [Services](#) and their corresponding Websites (the **Websites**) which are owned and operated by [Sandhills Group Companies](#).

We reserve the right to update this Privacy Policy from time to time by publishing the updated version on the Websites. We therefore encourage you to review our Privacy Policy periodically for the most up to date information. We will not substantially change the way we use personal data you have already provided to us without your prior agreement.

If you have any questions regarding our Privacy Policy, please [Contact Us](#).

WHY DO WE HAVE THIS POLICY?

Your privacy is important to us, and we are committed to protecting your personal data from unauthorised use or disclosure. We will therefore use your personal data, and transfer it to others, in accordance with this Privacy Policy.

Our Privacy Policy applies whenever you visit the Websites, during the period you receive services from us, during the process of you ordering products from us and afterwards.

1. WHAT PERSONAL DATA DO WE COLLECT AND WHEN?

We only collect personal data that we will use for the purposes set out in this Privacy Policy.

Specifically, we collect:

- **Personal data you submit to us**

You can submit personal data to us, such as your name, email address, or telephone number, in the following ways:

- Through forms, for example signing up to an offer, news or a competition;
- By sending us emails and text messages (SMS or MMS);
- By adding posts, reviews and other comments to the Websites, any Sandhills' mobile phone applications, or other community forums;
- By interacting with us on social media platforms (such as Facebook or Twitter);
- By speaking to us over the telephone; or

- By registering accounts on the Websites or any Sandhills' mobile phone applications, including setting up passwords and preferred user names, contact details, account details, your preferences and interests.

(Please note: If you submit details to us of any other person (e.g. a friend), please make sure you have their permission before doing so.)

- **Personal data we collect about you**

- **Full details of the purchases you make** on the Websites or on the telephone, including the time and date of purchase, the products you purchase from us, any relevant delivery address and details of any relevant payment card.
- **Information on what you search for, view, click on and access** in and through the Websites, our marketing emails and text messages (SMS or MMS). We may collect the time and geographic location of your device when you do so. This information may also include where you came to the Websites from, and where you went when you left it. We also track how often you visit and use the Websites. We do this through the use of email and website cookies (see our [Cookies Policy](#) for more information).
- **Technical information about the devices you use** to access the Websites. We collect each device's unique identifying code (MAC address), relevant IP address, operating system and version, web browser and version, and geographic location.
- **Your social media content (where this is in the public domain) and any messages you send us via social media.** This information can include posts, comments, pictures and video (see paragraph 4 for more information).
- **Information from banking, credit card and credit reference agencies** about your financial status and the status of any payment card presented to us (for example, if it has been reported stolen) to check we are likely to be paid for any transaction and to reduce the risk of fraud.
- **Profile information and insight from companies who already have lawfully collected information on you, such as credit reference agencies (customer insight companies), and who are legally allowed to share this information with us.** They may give us their views on what your household may look like, your status, likely preferences and behaviours.

2. WHAT ARE THE LEGAL BASES OF THE PROCESSING?

We will only process your personal data to the extent that one of the following legal bases applies:

- You have given your consent to the processing for one or more specific purposes;
- The processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract;
- The processing is necessary for compliance with a legal obligation to which we are subject;
- The processing is necessary for pursuing our legitimate interests or the legitimate interests of a third-party, except where such interests are overridden by your interests, rights or freedoms.

3. WHY DO WE USE YOUR PERSONAL DATA?

We use the personal data we collect for the following purposes:

- **To provide you with the Websites**, which requires a certain amount of technical information to be collected in order to work properly.
- **To power security measures and related services relating to your access to the Websites** for example to enable us to recognise your username and password and reset these if you forget them.
- **To enable you to order products from us on the Websites**, which again requires a certain amount of information to be collected, for example your payment card details so we can take payment and the products you buy so we can provide you with an invoice and receipt.
- **To enable us to run competitions and offers for which you have signed up**, about which we need to be able to communicate with you.
- **To gather feedback from you** about the Websites, our products, other services and activities from time to time. We may invite you to provide this feedback on occasion, for example by emailing you to ask if you would like to review a product you have bought. We may use independent research and feedback providers to do so on our behalf.
- **To contact you from time to time about things you have told us you want to hear about**, for example our products, news, offers, new competitions and sponsored events. You will at any time have the opportunity to 'opt-out' from any communications sent by us for direct marketing purposes.
- **To respond to any questions, suggestions, issues or complaints you have raised** with us.
- **To respond to any social media posts or other public comments you make** where these are made to or about us, the Websites, our products, services or other activities.
- **To communicate with you about operational changes to the Websites, our products, services**, for example if we were to withdraw or change this Privacy Policy.
- **To perform any contract we have entered into with you** but also to enforce a contract against you if you do not honour it, including seeking to collect any debts that you may owe us.
- **To gather statistics about how you and other people use the Websites, and what you think of our adverts, offers, news, product information, competitions, sponsored events, social media and other digital content.** We then analyse these statistics to understand if these things meet most people's needs, or if they should be improved, and if so, what design or other changes (for example, around the nature and timing of communications) would be most beneficial for our customers and our business.
- **To check that you have or are likely to have the means to pay us** for any products you have ordered from us on the Websites.

- **To monitor use of the Websites to see if it is being abused or threatened** for example by people posting inappropriate comments in review areas or by potential hackers looking to undermine their security.
- **To protect you and our business against any other criminal behaviour**, including identity theft and fraud.
- **To maintain administrative and legal records about our business** to enable us to understand what we have sold, how, when, where and at what price and account to tax authorities for the related taxes that we have to pay.
- **To enable us and our third party service providers to plan and manage our day-to-day business and related services as effectively as possible**, for example in predicting likely sales volumes of each product, so we can try and make sure we have enough stock to meet likely demand.
- **To enable us to understand what our customer and user base looks like** across our business. We do this by combining your personal data with data about our other customers and users of the Website, so we can spot trends and common factors.
- **To enable us to conduct focused market research** based on trends that we identify, which we can then use to further improve our products and services for all our customers.
- **In the process of anonymising your personal data** so that you are no longer identifiable to us.
- **To test new systems and processes** as we roll them out to make sure they work and will meet the high expectations we set for ourselves.
- **To assist us in the development of new products and services over time**, for example to gauge whether a new product is likely to appeal to a large proportion of our customer base.
- **To analyse whether the money we spend on advertising** on trade publications and trade websites, online and in search engines represents good value.

4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We cannot run our business or provide many of our services and benefits without involving other people and businesses and sometimes we pass your personal data to these other people and businesses as set out below. We only share your personal data where we can do so in accordance with our legal data protection and privacy obligations. We share the personal data we collect with:

- [Sandhills Group Companies](#) and [Brands](#) and [Services](#). We do so because we hope to have a relationship with you across all these different brands and businesses, if not now, then in the future, and we want to be able to provide you with the same value and high quality of experience wherever you choose to interact with us.
- **Other people and businesses who help us provide the Websites, and related services to you**, for example, information technology companies who design and host the Websites and payment services companies who enable you to use payment cards with us.

- **Advertiser and advertising networks** which require the data to select and serve relevant adverts to you and others. We may use the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advert to that target audience.
- **Analytics and search engine providers** who assist us in the improvement and optimisation of the Websites.
- **Our insurers and insurance brokers** where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- **Banks and finance companies** where we have allowed them to offer you the possibility of purchasing our products on credit or through a loan arranged online. They may retain this information, for example if you take any service they offer, for the purpose of providing you with that service.
- **Business partners, suppliers and sub-contractors** for the performance of any contract we enter into with them or you.
- **The prospective buyer** of any part of our business or assets that we may sell.
- **Our professional advisers** for example our lawyers, accountants and technology consultants when they need it to provide advice to us.
- **The police, local authorities, tax authorities, the courts** and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime.
- **Other people who make a subject access request to us**, where we are allowed to do so by law (see **Managing Your Personal Data** below for what we mean by a **subject access request**).

We may also share the personal data we collect where we are legally obliged to do so, for example, to comply with a court order.

5. SOCIAL MEDIA, BLOGS, REVIEWS, AND SIMILAR SERVICES

Any posts or comments you make to us on social media will be shared under the terms of the relevant social media platform (for example, Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other people, not us, so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your personal data, what data relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and services on any of our blog, review or user community services will be shared with all other members of that service and the public at large.

You should ensure that any comments you make on these services, and on social media in general, are fit to be read by the public, and in particular are not offensive or defamatory. You are responsible

for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

6. SECURITY OF YOUR PERSONAL DATA

We take all steps reasonably necessary to implement all appropriate technical and organisational measures to ensure the protection of your personal data. We take every precaution to protect all personal data received from our visitors and account users against unauthorised access and use. Personal data provided through the Websites is stored on our secure servers or those of any third party we engage to provide our IT platform, and is encrypted using standard technology.

Where personal data is transferred to third parties for processing, we will ensure that such third parties implement all appropriate technical and organisational measures to ensure the protection of the personal data in accordance with the applicable laws.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot ensure that loss, misuse or alteration will not occur. Thus, we cannot be held liable if such efforts are ineffective.

Where we have given you, or you have chosen, a password which enables you to access your account or certain parts of the Websites, you are responsible for keeping the password confidential and must not share it with anyone. You are responsible for any actions carried out using your password except where there has been fraud.

7. INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

Although we are based in Luxembourg, we occasionally need to use international suppliers or partners to help ensure you receive the very best products and services from us as well as coordinate with our international [Sandhills Group Companies](#).

To allow us to run our business on this basis, the personal data we collect may be transferred to, stored and used at premises in countries outside the European Economic Area (EEA), whose data protection laws may not be equivalent to those in the EEA ('Non-Equivalent Countries'). By using our services, you acknowledge that your personal data may be transferred to Non-Equivalent Countries. If we do so, we will put in place appropriate safeguards for the protection of your personal data in Non-Equivalent Countries, such as the signing of standard data protection clauses between us and our international suppliers or partners. Should you wish to know where these safeguards have been made available or to obtain a copy of them, [Contact Us](#).

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

In accordance with our legal data protection and privacy obligations, we will only retain your personal data for as long as we need it to achieve the purpose(s) for which we obtained it in the first place. We will then either securely delete it or anonymise it so that it cannot be linked back to you (see paragraph 2 for full details of those purposes). For more information on how long cookies are stored, please refer to our [Cookie Policy](#).

9. MANAGING YOUR PERSONAL DATA

You can contact us to discuss the processing of your personal data at any time using the details provided below.

It is very important to us that all the personal data we hold about you remains accurate and up to date to reduce the risk of a misunderstanding.

We need your help in doing so. If you have an online account with us, please ensure that the personal data (for example, contact information) you provide to us through that account remains accurate and up to date. Please review and update it regularly.

You have a number of rights which we respect and aim to uphold in everything we do. These rights include:

1. **Right of access.** You have the right to access your personal data and request a copy in electronic format. If you request a copy of your personal data more than once, we may charge a reasonable fee based on administrative costs.
2. **Correcting inaccurate information.** If you have reason to believe any of the personal data we collect on your behalf may be inaccurate, and you cannot correct such inaccuracy yourself through your registered account with us, please contact us (see below for how to do this).
3. **Requesting that your personal data are erased.** Under specific circumstances, you have the right to ask us to erase all the personal data we have about you (for example, if your personal data are no longer necessary for achieving the purposes for which they have been collected). We will reply to your request and erase your data where required to do so, in accordance with and within the limits of the applicable laws. Please note that if we erase your personal data on your request, this may have adverse consequences, such as preventing us from communicating with you or providing you with our services.
4. **Stopping or restricting processing.** You have the right to request from us to stop and/or suspend the processing of your personal data when your interests, rights or freedom override our own legitimate interests to continue such processing. We will reply to your request and stop or suspend the processing of your personal data when required to do so, in accordance with and within the limits of the applicable laws.
5. **Stopping our marketing.** We provide the means for you to stop all email and text (SMS or MMS) communications you receive from us – please see the "unsubscribe" link and "STOP" details we include in each email and text respectively. You can also contact us at any time using the details below and let us know what you would like us to change.
6. **The right to data portability.** You have the right to receive from us the personal data that you provided, in a structured, commonly used and machine-readable format. You have the right to transmit these data or request us to transmit them to another service provider
7. **Reviewing our use of automatic computer processing.** You can ask us to have one of our staff review a decision about you which has been taken automatically by computer. One common example is if we decline an order you place with us online for anti-fraud or credit check reasons. Please note that these decisions can come about due to policy decisions taken by banks, card and payment processing companies and credit reference agencies who

independently hold data about you and to resolve them, you may have to speak to them directly.

Depending on your country of residence or domicile, you may have other legal rights over the personal data we collect from you and your devices. We will honour all such legal rights.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

If you have any questions or complaints about our use of your personal data, please [Contact Us](#). We will do our very best to answer any question and resolve any complaint to your satisfaction. If, for whatever reason, you feel we do not meet the high standards we expect of ourselves, you have a right to complain to the Luxembourg data protection authority (*La Commission nationale pour la protection des données* - the **CNPD**).

10. THIRD PARTY LINKS

The Websites may contain links to the websites of third parties. If you follow a link to any third party website, please note that these websites will have their own privacy policies and we do not accept any responsibility or liability in respect of the same.

11. CONTACT US - UPDATING YOUR PREFERENCES AND DETAILS

If you:

- have any queries about this Privacy Policy;
- no longer want to participate in our services; or
- wish to opt out of receiving further information as referred to in paragraph 8 of this Privacy Policy,

please let us know by [Contacting Us](#).

Please help us to keep your records up to date by notifying us of any changes to your personal details.

12. LAW & JURISDICTION

This Privacy Policy, shall be governed by and interpreted in accordance with the laws of the Grand-Duchy of Luxembourg and you irrevocably submit to the sole jurisdiction of the courts of the Grand-Duchy of Luxembourg.

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