

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights and how Eggnogg uses your data. We hope the following sections answer any questions you have, but if not, please do get in touch with us. You can contact Gareth Edmunds, Eggnogg Director and Data Protection Officer, on +44 117 9277747 or gareth@eggnogg.co.uk.

We will need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish. It is available on our website, www.eggnogg.co.uk, or we can send you a copy if you request one.

For the purposes of the EU General Data Protection Regulation (GDPR) legislation, Eggnogg Ltd is the data controller. For simplicity throughout this notice, 'we' and 'us' means Eggnogg Ltd.

This Privacy Notice also applies to international customers, but there are additional terms for some countries. You'll find more information in section 16 of this Privacy Notice.

2. What is Eggnogg Ltd?

Eggnogg Ltd is an independent, Bristol-based company and the UK's largest supplier of colour-in paper and fabric products for children and adults. It is a limited company with two Directors, Kate and Gareth Edmunds. The company's headquarters and registered office is 6 Glentworth Road, Clifton, Bristol BS8 4TB UK. Eggnogg has two websites: www.eggnogg.co.uk and www.eggnog.net. The Eggnogg brand is sometimes referred to as Eggnogg Colour-in.

Kate is a graphic designer and illustrator who spent 15 years working in TV videographics and print design before founding Eggnogg in 2009. She personally designs and develops every Eggnogg product, as well as looking after social media and marketing. Her husband, Gareth, who has 30 years' experience in IT consultancy and project management, joined Eggnogg in 2015. He is responsible for operations and finance.

Eggnogg's multi-award-winning products include a wide range of paper items (tablecloths/posters, placemats, fancy dress outfits, postcard books and wallpaper), fabric goods (backpacks, shopping bags, pencil cases and picnic blankets) and bespoke items. Eggnogg sells to major UK retailers and scores of independents across the UK, Europe and the world.

3. Explaining the legal bases we rely on

The law on data protection sets out several 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 to you, we'll collect your address details to deliver your purchase, and pass them to our courier. Or to enable us to re-paper your invoice, we will collect your billing address and contact details.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we will pass on details of people involved in fraud or other criminal activity affecting the company 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.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

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 to help us develop new products and services.

We may also use your email address to send you direct marketing information, telling you about any Eggnogg products and services that we think might interest you.

4. When do we collect your personal data?

We may collect your personal data when, for example, you:

- Visit any of our websites, and use your account to buy products and services, or redeem vouchers from the Partnership on the phone, in a shop or online.
- Make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- Create an account with us.
- Purchase a product or service in store or by phone but don't have (or don't use) an account.
- Engage with us on social media.
- Contact us by any means with queries, complaints etc, or ask us to email you information about a product or service.
- Enter prize draws or competitions.
- Choose to complete any surveys or forms we send you.
- Comment on or review our products and services (any individual may access personal data related to them, including opinions, so if you include information about a third party, it may be passed on to them if requested).
- Have given a third party permission to share with us the information they hold about you.

5. What sort of personal data do we collect?

We aim to collect and hold the minimum amount of personal data we can, consistent with the policies outlined in this notice. For example:

- If you have a web account with us – we may collect your name, gender, date of birth, billing and delivery address, orders and receipts, email and telephone number.
- If you have interactions with us online, by phone or mail – we may collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, voucher redemptions, brands you show interest in, Eggnogg web pages you visit, which site you came from to ours, and how and when you contact us.
- Information gathered using cookies in your web browser. You can learn more about how we use cookies and similar technologies in section 14 of this Privacy Notice.
- 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. This may include:

- Payment card information.
- Your comments and product reviews.
- Technical information about your internet connection and browser as well as the country where your computer is located, the web pages viewed during your visit, and any search terms you entered, to help us deliver the best possible web experience.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

6. How and why do 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 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.** 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 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 based on 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'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. 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 logins from unexpected locations.
- **To process payments and to prevent fraudulent transactions.** We do this based on 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 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 social media 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 based on 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 Notice, 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 display the most interesting content to you on our websites,** we'll use data we hold about your favourite brands or products and so on. We do so based on your consent to receive app notifications and / or for our website to place cookies or similar technology on your device. For example, we might display a list of items you've recently looked at or offer you recommendations based on your purchase history and any other data you've shared with us.
- **To administer any of our prize draws or competitions which you enter,** based on your consent given at the time of entering.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

- **To develop, test and improve the systems, services and products we provide to you.** We'll do this based on 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 send you survey and feedback requests to help improve our services.** These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

7. Combining your data for personalised direct marketing

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered at different times.

8. 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 personal data is password-protected, and sensitive data such as payment card information is protected. We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

9. How long will 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.

Some examples of customer data retention periods are:

Orders

When you place an order, we'll keep the personal data you give us for 5 years so we can comply with our legal and contractual obligations. In the case of certain products, such as electrical and nursery items, we'll keep the data for 10 years.

Inactive accounts

If you've not used your account for more than 5 years, it will be flagged as inactive and we'll contact you to ask whether you want to keep it open. Unless you reply to say 'yes', we'll close the account and delete or anonymise the personal data associated with it.

Warranties

If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

10. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties, for example delivery couriers, agencies who assist with fraud management or handle complaints, and so on.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

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 fulfilment houses and delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google and Facebook, to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.
- Data insight companies to ensure your details are up to date and accurate.

Sharing your data with third parties for their own purposes

We will only share data with third parties for their purposes in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes. For example, if you enter a holiday competition and tick a box agreeing that the travel company can send you promotional information directly. Or if we run a joint event with a restaurant, and you agree to receive direct communications from them.
- 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.
- We may, from time to time, expand, reduce or sell the company and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

To help personalise your journey through Partnership websites we currently use the following companies who will process your personal data as part of their contracts with us:

- Facebook
- Google
- Instagram
- Twitter
- YouTube

11. 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).

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 company in the UK.

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. For example, this might be required to fulfil your order, process your payment details or provide support services. Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

12. What are your rights over your personal data?

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.
- 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.

You can contact us to request to exercise these rights at any time. To ask for your information, please contact:

The Data Protection Officer
Eggnogg Ltd
6 Glentworth Road
Clifton
Bristol
BS8 4TB
United Kingdom
+44 117 9277747
gareth@eggnogg.co.uk

To ask for your information to be amended, please update your online account or contact Eggnogg. If we choose not to action your request, we will explain to you the reasons for our refusal. 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.

In cases where we are processing your personal data based on 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.

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.

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.

13. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails to you.
- If you have an account, log in and change your preferences.
- Write to Eggnogg Ltd, 6 Glentworth Road, Clifton, Bristol BS8 4TB or email gareth@eggnogg.co.uk.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

14. Cookies

To make full use of the online shopping and personalised features on our websites, your computer, tablet or smart phone will need to accept cookies, as we can only provide you with certain personalised features of this website by using them.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

Our cookies don't store sensitive information such as your name, address or payment details: they simply hold the 'key' that, once you're signed in, is associated with this information. However, if you'd prefer to restrict, block or delete cookies from eggnog.co.uk, or any other website, you can use your browser to do this.

Each browser is different, so check the 'Help' menu of your browser to learn how to change your cookie preferences.

15. 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 going online to www.ico.org.uk/concerns. (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 15.

16. If you live outside the UK

For all non-UK customers

This Privacy Notice is only available in English, although we are happy to help with translation if we can.

In the case of any dispute about its meaning, the English version will take precedence.

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 from your country of residence to ourselves and to third parties located in the UK or elsewhere.

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 may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

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.

We'll ensure that any third parties process your personal data only in accordance with their legitimate interests. These third parties may be subject to different laws from those which apply in your country of residence. Please note that we do not take active steps to ensure that any overseas recipient of your personal data complies with the laws which apply in your country.

Australia

For the purposes of this Privacy Notice, 'personal data' means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not the information or opinion is recorded in a material form.

If you are in Australia 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.

Eggnogg Ltd Privacy Notice – Protecting Your Privacy

If we have not come back to you within 30 days, or you are not happy with the response you've received, you may submit a complaint to the Office of the Australian Information Commissioner.

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).

USA

To learn more about our cookies and website 'track' and 'do not track' practices, please see our section 14 of this Privacy Notice.

Canada

As your data may be transferred to third parties outside Canada, local police or other enforcement, regulatory or Government bodies may have access to that data, with or without our knowledge.

The personal data we process may be accessed by people within the Partnership, or by our third-party service providers, who require access for the purposes indicated in this Privacy Notice, or as may be permitted or required by applicable law. The personal data we collect is largely held in the UK.

If you have any questions, please contact our Data Protection Officer.

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, or in some Canadian provinces, your local Privacy Commissioner.

South Korea, Malaysia, Singapore, Qatar

Terms used in this Privacy Notice shall have the meanings assigned to them by the Personal Data Protection Act 2010 (also known as the PDPA).

By placing an order with us, opening an account, browsing our website and/or agreeing to receive digital direct marketing communications, you agree that we may process your personal data as described in this Privacy Notice, including for analytics and research into website use.

Hong Kong

When you agree to receive direct marketing emails from us, we'll send you promotions on products we sell at Eggnogg.

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.

17. 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, at:

Eggnogg Ltd
6 Glentworth Road
Clifton
Bristol
BS8 4TB
United Kingdom
+44 117 9277747
gareth@eggnogg.co.uk