

## PRIVACY POLICY

### 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 Weaves UK Trading LTD uses your data. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this policy from time to time. We'll notify you of any significant changes.

When do we collect your personal data?

- When you purchase a product or service in store.
- When you contact us by any means with queries, complaints etc.
- When you fill in any forms. For example, if an accident happens in store, we may collect your personal data.
- When you've given a third-party permission to share with us the information they hold about you.
- When you visit our stores which usually have CCTV systems operated for the security of both customers and employees. These systems may record your image during your visit.
- Any individual may access personal data related to them, including opinions. So if your comment or review includes information about Weaves UK Trading LTD, it may be passed on to us on request.

What sort of personal data do we collect?

- In store at the time of purchase, we will request: your name, email and telephone number.
- Details of your interactions with us through head office, in store or online.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, when you visited store and how and when you contact us.

- Personal details which help us to recommend items of interest.

For example, you might tell us your clothing size, which we'll use to guide our suggested items.

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.

- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit a shop or car park.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

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 our next sale will be, 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 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 on the basis of 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.
- To protect our customers, premises, assets and employees from crime, we operate CCTV systems in our stores which record images for security. We do this on the basis of our legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of 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 use of CCTV, 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 and telephone 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 on the basis of 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 develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- 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.

### **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 have encrypted access to all transactional areas of our ERP systems and using 'HTTPS' & Multi-Factor Authentication technology to access sensitive information.

Firewalls are installed to prevent the data breaches and un-authorized login attempts.

Maintain monitoring and control over data, set granular access- and activity-level policies, such as allowing a user access from an unmanaged device while blocking the download of sensitive data.

Identify potential ransomware activity and apply file policies to search for unique file extensions. After detecting potential attacks, use the template to suspend suspect users and prevent further encryption of the user's files.

We are using Azure Active Directory that helps ensure that only authorized users can access environments, data, and applications, offers multi-factor authentication for highly secure sign-in, including specialized administrative access through Azure Active Directory Privileged Identity Management, requires users to verify their sign-ins via mobile app, phone call, or text message.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

### **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.

### **Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties.

For example, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

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.

- Direct marketing companies who help us manage our electronic communications with you.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- 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 Weaves UK Trading LTD 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.

### **What are your rights over your personal data?**

An overview of your different rights

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.
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- 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.

- Review by a Partner of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You have the right to request a copy of any information about you that Weaves UK Trading LTD holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Data Protection Officer, Paternoster House, 65 St Pauls Churchyard, London, EC4M 8AB or email [information@weavesgroup.com](mailto:information@weavesgroup.com)

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

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.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of 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.

Direct marketing

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.

Checking your identity

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.

### **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:

- Write to Data Protection Officer, Paternoster House, 65 St Pauls Churchyard, London, EC4M 8AB or email [information@weavesgroup.com](mailto:information@weavesgroup.com) Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.