

PLATOS GIRL LIMITED PRIVACY NOTICE

Welcome to Platos Girl Ltd privacy notice.

1. Important information and who we are

1. What Is The Purpose Of This Document?

Platos Girl Limited is committed to protecting the privacy and security of your personal information. This privacy notice aims to give you information on how Platos Girl Limited collects and processes your personal data when you correspond with us by phone, e-mail or otherwise and through your use of our website www.platosgirl.co.uk (our **site**), including:

- information you provide when you fill in forms on our site;
- any data you may provide through our site when you visit our site, register to use our site, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, leave comments, feedback, messages and other information you make about us on our site including blogs and discussion forums and when you report a problem with our site; and
- information you provide during and after the supply of products or use of any of the services provided by us.

This notice applies to anyone who uses our site or who buys or uses any of our products and / or services. We may update this notice at any time.

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.

2. Controller

Platos Girl Limited (Company Number: 12338536) whose Registered Office is C/o SJW Accountants, Clawthorpe Hall Business Centre, Burton In Kendal, Carnforth, Lancashire LA6 1NU. (collectively referred to as Company, we, us, our in this privacy notice) is the controller and responsible for your personal data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Our site is not intended for children and we do not knowingly collect data relating to children. Platos Girl Limited is the controller and responsible for our site.

3. Contact details

Full name of legal entity: Platos Girl Limited

Registered office: C/o SJW Accountants, Clawthorpe Hall Business Centre, Burton In Kendal, Carnforth, Lancashire LA6 1NU.

Trading address: Bridgend House, Park Road, Milnthorpe, Cumbria LA7 7AN

Email Address: help@platosgirl.co.uk

Telephone Number: *****

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.

4. Changes to the privacy notice

This version was created in January 2020.

5. Your duty to inform us of 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.

6. Third-party links

Our 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.

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 follows:

1. **Identity Data**

includes first name, maiden name, last name, username or similar identifier, marital status, title, age, date of birth, gender, job title and profession.

2. **Contact Data**

includes postal address, billing address, delivery address, email address and telephone numbers.

3. **Financial Data**

includes bank account and financial information, credit card and payment card details.

4. **Transaction Data**

includes details about payments to and from you and other details of products and services you have purchased from us.

5. **Technical Data**

includes internet protocol (IP) address used to connect your computer to the Internet, your login information and data, browser and version, time zone, location, browser plug-ins, operating system, technology platform, your activity on our site, and the website you exit to, and other technology on the devices you use to access our site.

6. **Profile Data**

includes your username and password, quote and sample requests, purchases or orders made by you, your interests, preferences, feedback and survey responses.

7. **Usage Data**

includes information about how you use our site, products and services; information about your visit, including the full Uniform Resource Locators (URL), the clickstream to, through and from our site (including date and time); products and pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as, but not limited to, scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We also collect any phone number used to contact our company.

8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

9. 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.

10. We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

11. **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 product or service 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 use different methods to collect data from and about you including:

1. **Through Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

1. visit our site;
2. register to use our site;
3. search for a product or service;
4. place or request a quote, sample, or order on our site;
5. request marketing to be sent to you;
6. enter a competition, promotion or survey;
7. leave comments, feedback, messages and other information you make about us on our site including blogs and discussion forums;
8. send us some feedback or contact us directly.

2. **Through Automated technologies or interactions.**

As you interact with our site, we may automatically collect Technical Data or Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

3. **Data from Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

0. from Information if you use any of the other websites we operate or the other products we provide; and
1. from third parties including, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies who we work closely with.

4. **From Technical Data** from the following parties:

0. analytics providers such as Google Analytics based outside the EU;?????
1. advertising networks such as Facebook based outside the EU;???????????
2. search information providers such as Google based outside the EU;???????????
3. Compute, storage, and networking providers such as Amazon based outside the EU.???????????????

5. **From Contact, Financial and Transaction Data** from providers of technical, payment and delivery services such as Sage based in the EU.

6. **From Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

1. 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:

0. Where we need to perform the contract we are about to enter into or have entered into with you.
1. 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.
2. 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 third party direct marketing communications to you via email, text message, via social media. You have the right to withdraw consent to marketing at any time by contacting us using any of the contact details / methods set out above.

2. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all 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. Please contact us using any of the contact details / methods set out above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To carry out our obligations arising from any contracts entered into between you and us and to: (a) provide you with the information, products and services that you request from us (b) build a relationship with you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) enforce or apply our terms and conditions of supply	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To notify you about changes to our products or service	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To enable you to participate in any interactive features of our service, when you choose to do so and partake in a prize draw or competition	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our site, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing

strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To administer our site and for internal training and operations, including accounting, administration, troubleshooting, data analysis, testing, research, statistical and survey purposes.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy)
To provide feedback to our staff including posting any comments, feedback, messages and other information you make about us via our site, on our intranet or other media. If you do not want Us to use your data in this way please let us know in writing.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy)

3. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may restrict our use of your data by emailing help@platosgirl.co.uk

4. Promotional offers from us

We may use your personal 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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have opted in to receiving these communications.

5. Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

6. Opting out

You can ask us or third parties to stop sending you marketing messages at any time by emailing help@platosgirl.co.uk or by following the opt-out links on any marketing message sent to you or by contacting us using any of the contact details / methods set out above.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

7. Cookies & JavaScript Resources

Platos Girl Ltd may set cookies on your computer. However, this is for Internal Session Data only. We do not hold any private data about users on our site.

You may delete/disable cookies, however, disabling cookies may prevent you from using the full range of Services available on the Website.

You can choose to enable or disable cookies in your web browser. In the majority of cases your browser will accept cookies by default. This can, however, be altered within your browser settings. We also include JavaScript resources from the following third parties on our site. These parties may place tracking cookies, inspect your web request, browser, or computer, to record, process, analyse, or sell your personal data with potentially no restriction.

- Google Ads
- Microsoft Advertising
- Google Analytics
- Google Tag Manager
- Facebook
- LinkedIn

These services may hold your personal information and may be able to associate your activity on these websites with your activity on totalmerchandise.co.uk for purposes commercial, legal, or otherwise. Our intent is to share information with these third parties to be able to better target specific customer profiles with advertisements.

We include JavaScript resources from the following parties to collect anonymised data. These parties may place tracking cookies, inspect your web request, browser, or computer, to record, process, analyse, or sell anonymised data with potentially no restriction.

- Hotjar
- Logrocket
- Google Optimise

Our intent is to use this information to improve the user experience and reliability of our site.

8. 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 using any of the contact details / methods set out above.

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

1. We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.
 0. Internal Third Parties as set out in the Glossary at the end of this policy.
 1. External Third Parties as set out in the Glossary at the end of this policy.
 2. Specific third parties listed below:
 1. Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 2. Analytics and search engine providers that assist us in the improvement and optimisation of our site; and
 3. Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
 3. 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.

2. 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.

6. International transfers

1. We do not transfer your personal data outside the European Economic Area (EEA).
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7. Data security

1. 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
2. All information provided to us is stored securely. All network communications between users of our site and our site servers over The Internet are encrypted using SSL/TLS technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
3. 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

1. 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 aspects of your personal data are set out below.

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.

Personally Identifiable Information	Maximum Retention Duration	Reason
Identity Data: Name Contact Data: address, email address, phone number Financial Data: company, arranged payment terms.	5 years since last contact from client.	Clients routinely come back to Total Merchandise within 5 years to request repeat orders. We retain this information to provide this

<p>Identity Data / Company information Company name, clients, domain name.</p>	<p>5 years since last contact from company.</p>	<p>service. Companies routinely come back to Total Merchandise within 5 years to request repeat orders. We retain this information to provide this service.</p>
<p>Contact Data and Transaction data: Enquiry/Order information Delivery address, delivery contact, delivery phone number, billing contact address, billing contact, phone number, client, company, payment method. Including client and company information see above.</p>	<p>5 years since last contact regarding the order in question.</p>	<p>Clients and companies routinely come back to Total Merchandise to request repeat orders. We retain this information to provide this service.</p>
<p>Usage Data: Generic Web Request Logs IP address, browser user-agent.</p>	<p>7 days since record creation</p>	<p>Total Merchandise use this information to protect their software applications against potential threats and may use this information to identify particular hosts or individuals for purposes of mitigating the attack. Attacks may take place over a number of days, storing multiple days of data may allow Total Merchandise to better detect these threats.</p>
<p>Usage Data: Debug Web Request Logs May include any information transmitted by the user's web browser to servers associated with Total Merchandise.</p>	<p>1 day since record creation</p>	<p>Total Merchandise may capture and store any data sent by the web browser to for purpose of debugging specific features in their software applications. This capture and storage will be specific. Captured data will not be stored for a duration greater than the time it takes to use this data to debug features.</p>

9. Your legal rights

1. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are listed below:
 0. **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.
 1. **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.
 2. **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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 3. **Object to processing** of your personal data 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 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 overrides your rights and freedoms.
 4. **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 scenarios:
 1. if you want us to establish the data's accuracy;
 2. where our use of the data is unlawful but you do not want us to erase it;
 3. 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
 4. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
 5. **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.
 6. **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.
2. If you wish to exercise any of the rights set out above, please contact us.
3. **No fee usually required**

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.

4. **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 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 speed up our response.

5. **Time limit to respond**

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 you have made a number of requests. In this case, we will notify you and keep you updated.

10. **Glossary**

1. **Where we refer to the following lawful basis this means:**

Legitimate Interest

means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract

means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Cookie

means a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the Website that placed it

there, not any other sites. The primary purpose of marketing cookies is to track a person between websites, e.g. from Facebook to totalmerchandise.co.uk.

2. Third Parties

Internal Third Parties

Other companies acting as joint controllers or processors and who are based in the UK and provide IT and system administration services, database and server administrators and undertake leadership reporting.

External Third Parties

(a) Service providers acting as processors based in the UK who provide delivery of reviews, products, advertising and marketing, IT and system administration services and email platform providers.

(b) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

(c) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.