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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Hangerworld LTD collecting/processing their personal data.
- 2.2 All Employees/Staff of Hangerworld LTD who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Hangerworld LTD are a supplier of high quality garment accessories and hangers across many seller channels and platforms.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- (<u>chris.hopley@hangerworld.com</u>)
- (01253 600633)

The personal data we would like to collect from/process on you is:

| Personal data type: | Source |
|-------------------------|------------------------------------|
| Name and postal address | Amazon Seller Central (America) |
| Name and postal address | Amazon Seller Central (Pan Europe) |
| Name and postal address | Ebay Seller Central (America) |
| Name and postal address | Ebay Seller Central (Pan Europe) |
| Name and postal address | Hangerworld LTD Website |
| Name and postal address | PriceMinister Europe |

The personal data we collect will be used for the following purposes:

- To process requested and purchased items.
- To facilitate the delivery of purchased items

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Our legal basis for processing for the personal data:

• To process and facilitate orders and to ensure that delivery of goods is completed

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Hangerworld LTD to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time please see GDPR DOC 2.7A

3.3 Disclosure

Hangerworld LTD will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities if applicable:

| Third country (non- EU)/international organisation | Safeguards in place to protect your personal data |
|--|---|
| Global Iris (Europe) | Encrypted Virtual Payment Gateway |
| PayPal (Europe) | Encrypted Virtual payment Gateway |

3.4 **Retention period**

Hangerworld LTD will process personal data for Financial transactional data will be held for 7 years for legal, tax or accounting purposes. We will destroy or permanently anonymize your personal information at the point that we no longer need to process it for our ongoing legitimate business needs or for any legal reason. If this is not possible (for example, because you're personal information has been stored in backup archives), then we will securely store it and isolate it from any further processing until deletion is possible...

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.

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- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Hangerworld LTD refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

https://www.hangerworld.com/GDPRSAR/

3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Hangerworld LTD (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Hangerworld LTD's data protection representatives Data Protection Officer / GDPR Owner.

| Supervisory authority contact details | | [Data Protection Officer (DPO)] / [GDPR Owner] contact details | |
|---------------------------------------|----------------------------------|---|--|
| Contact Name: | Information Commissioners Office | Christopher Hopley | |
| Address line 1: | Wycliffe House | Hangerworld LTD | |
| Address line 2: | Water Ln | Prestige House | |
| Address line 3: | Wilmslow | Cornford Road | |
| Address line 4: | | Blackpool | |
| Address line 5: | SK9 5AF | FY4 4QQ | |
| Email: | | Chris.hopley@hangerworld.com | |
| Telephone: | 0303 123 1113 | 01253 600633 | |

The details for each of these contacts are:

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3.7 Privacy statement

Read more about how and why we use your data here

https://www.hangerworld.com/GDPR/

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Hangerworld LTD, will collect and use your personal data for:

Information regarding your marketing preferences

Hangerworld LTD may market to you, where permitted by law, by post, email, telephone, mobile (i.e. SMS, in-app messaging and push notification) about our products or Services.

If you don't want us to use your data in this way or generally change your mind about receiving any form of marketing communications, you can unsubscribe at any time using the unsubscribe functionality in the communication you receive or by amending your profile accordingly. You may also be able to opt-out of push notifications at a device level (e.g. by way of your iOS settings). If you choose to unsubscribe from our marketing, we will keep a record of your preferences so that we don't bother you with unwanted marketing in future.

Feedback and Reviews

If you give us feedback we will use it to reply to your questions or queries, to provide customer support and resolve any problems with your Orders or with the Services. We will publish reviews that you send to us about the products on our platform and our Services in general and we also analyse your feedback to improve and develop our Services and in order to enhance your experience.

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Why does Hangerworld LTD need to collect and store personal data?

In order for us to provide you with goods purchased we need to collect personal data for correspondence purposes and/ delivery. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Hangerworld LTD would contact you for additional consent.

Will Hangerworld LTD share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Hangerworld LTD in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Hangerworld LTD's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Hangerworld LTD use the personal data it collects about me?

Hangerworld LTD will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Hangerworld LTD is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Hangerworld LTD contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

<u>Can I find out the personal data that the organisation holds about me?</u> Hangerworld LTD at your request, can confirm what information we hold about you and how it is processed. If Hangerworld LTD does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.

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- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Hangerworld LTD or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Hangerworld LTD accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months)

Contact details of the Data Protection Officer / GDPR Owner:

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| | Data Protection Officer / GDPR Owner contact details |
|-----------------|--|
| Contact Name: | Christopher Hopley |
| Address line 1: | Hangerworld LTD |
| Address line 2: | Prestige House |
| Address line 3: | Cornford Road |
| Address line 4: | Blackpool |
| Address line 5: | FY4 4QQ |
| Email: | Chris.hopley@hangerworld.com |
| Telephone: | 01253 600633 |

Document Owner and Approval

A current version of this document is available to all members of staff on the corporate intranet and is published

https://www.hangerworld.com/GDPR_REC4.1.pdf

Signature:

Date:

Change History Record

| Issue | Description of Change | Approval | Date of Issue |
|-------|-----------------------|------------|---------------|
| 1 | Initial issue | Emma | 21/05/2018 |
| | | Hollindale | |

