



THE COLLECTIVE

The Collective Agency (London) Limited Privacy Notice

We respect the privacy of every person who visits or submits personal information through our website at www.thecollective.agency (the “Site”) and who uses the products and services that we offer, and we are committed to ensuring you have a safe online experience and that your personal information is protected.

1. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice (“**Privacy Notice**”) explains what we do with any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Notice also sets out your rights in respect of our processing of your personal information.

This Privacy Notice:

- informs you of the nature of the personal information about you that is processed by us and how you can request that we delete it, update it, transfer it and/or provide you with access to it; and
- is intended to assist you in making informed decisions when using the Site and our products and services. Please take a moment to read and understand it. It should be read in conjunction with our Website Terms of Use.

This Privacy Notice only applies to the processing of your personal information obtained by us. It does not apply to personal information collected by third parties who may connect with our Site.

2. ABOUT US

The Site and our products and services are made available by The Collective Agency (London) Limited (“**The Collective Agency**”) who is the data controller responsible for your personal information. The Collective Agency is a private limited company registered in England under company registration number 09286740 with its registered office address located at The Workshop, 32-40 Tontine Street, Folkestone CT20 1JU. The Collective Agency is registered as a data controller with the UK’s Information Commissioner’s Office under registration number ZA570714.

3. HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise any of your rights set out in this Privacy Notice, please contact: office@thecollective.agency

4. PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

Our primary reasons for collecting personal information from you are to: (i) provide our products and services to you; (ii) carry out requests made by you on the Site; (iii) investigate and deal with enquiries or disputes; (iv) comply with applicable laws and regulations; (v) enforce our agreements or contracts with you; (vi) protect the rights, property and safety of us or third parties, including our other

customers and users of the Site and (vii) provide support for the provision of our products and services.

In particular, we use your personal information for the following purposes:

A. Fulfilment of orders for our products and services and issues arising from that fulfilment.

We collect and maintain personal information that you voluntarily submit to us during your use of the Site, when you purchase products from us and use our services.

Contacting us: If you make an enquiry about us, our products or our services through the Site, we will use the personal information you supply to respond to your enquiry.

Brochure requests: We use your name and contact details (postal address or email address) to send you our brochures and other publications when you request them.

Fulfilling orders: If you make a purchase with us, we will store the information supplied in the initial contact and collect further information to set up an account so that we can retrieve information about you if you wish to order products or services in the future. This will include the address to which invoices should be sent as well as delivery and installation information.

Payment: We will use your personal information and account information so that we can administer your account with us, and we will use any payment details you provide to process payments at your request. Payment details are never stored.

Warranty Claims and Disputes: If you make a warranty claim or complaint, we may process your personal information details as well as any other relevant personal information you provide in order to investigate and deal with the warranty claim or complaint. If a third party is making a warranty claim in relation to any of The Collective Agency products and services which they have supplied to you, we may need to collect personal information about you, such as your name, contact details and any other relevant information, in order to deal with the warranty claim or complaint.

Who do we share your personal information with for this purpose?

We will share your personal information with the following categories of third parties as necessary when supplying our products and services:

- **Credit card companies and other payment providers** who assist us with the verification of card payments and the processing of refunds;
- **Delivery and courier companies** who assist us with delivering products to our customers;
- **The onsite builder or professional installer** with whom we may need to cooperate in relation to the delivery and/or installation of products and services you have requested from us; and
- **Manufacturers or wholesale distributors** who may need information about the product and how you may have used it, in order to assist in determining a warranty claim or complaint.
- **Web hosting, optimisation and management companies** who assist us with the hosting, operation, optimisation and maintenance of our Site, the administration of your account and the provision of access to secure areas and functionality on our Site.

N.B. This list is not exhaustive and there may be circumstances where we need to share personal information with other third parties in order to provide the products and services as effectively as we can.

What is our legal basis?

It is in our legitimate interest (as well as yours) to use your personal information in a way that ensures we provide good customer service to you and in particular to ensure we provide the products and services you have requested in an effective and efficient way; and/or

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you.

B. Marketing activities

We may carry out the following marketing activities using your personal information:

Mailshots: From time to time, we may send you an email to tell you about new products or news events about the success of particular products that we supply. For this purpose, we may process your name, contact details (including email address, postal address and/or telephone number) and any other personal information volunteered by you in your contact with us.

Who do we share your personal information with for these purposes?

We do not share your personal information collected in connection with any marketing activities.

What is our legal basis?

It is in our legitimate interest to use your personal information to enable us to inform you of new products and news media about the success of products you may already have purchased to enable you to be fully informed about our product ranges.

C. Business administration and legal compliance

We may use your personal information for the following business administration and legal compliance purposes:

- to comply with our legal obligations;
- to enforce our legal rights;
- to protect the rights of third parties; and
- in connection with a business transition such as a merger, re-organisation, acquisition by another company, or sale of all or a portion of our assets.

Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

Where we use your personal information in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order. We will not process any special (or sensitive) categories of personal information or personal information relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

N.B. Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes, will be notified to you using your contact details.

5. HOW WE OBTAIN YOUR CONSENT

Where our use of your personal information requires your consent, you can provide such consent at the time we collect your personal information by ticking the box on the “Contact Us” page of the Site or by sending us an email or letter to the addresses detailed in sections 2 and 3 above respectively.

6. THIRD PARTY LINKS AND SERVICES

Our Site contains links to third party websites and services. When you use a link to go from our Site to another website or you request a service from a third party, this Privacy Notice no longer applies.

Your browsing and interaction on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. We do not monitor, control or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you deal with and to contact them if you have any questions about their respective privacy notices and practices.

This Privacy Notice applies solely to personal information collected by us through our Site and/or the supply of our products and services and does not apply to these third-party websites and third-party service providers.

7. TRANSFERS OUTSIDE THE EEA

We use a software programme "Pipedrive" to manage our customer database. Pipedrive hosts EU customers' databases in Pipedrive's EU data centre located in Frankfurt, Germany. Regardless of the database being hosted in the EU, Pipedrive may transfer your Personal Data outside of the EEA to the United States for storage and processing by their service providers listed in the Pipedrive Terms of Service. Pipedrive comply with GDPR requirements providing adequate protection for the transfer of personal information from Europe to the U.S. Also, if Pipedrive transfer your data to a country other than the US this is limited to countries or regions deemed by the European Commission to provide adequate protection of personal data in connection with storage and processing of data, fulfilling customer requests, and operating the service. Full details of Pipedrive's Privacy Policy can be found at www.pipedrive.com/en/privacy.

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Regarding personal information we have processed in connection with the Request a Brochure Sections of the Site, we will retain personal information relevant to that request for 18 months from the date of the request. We may then destroy such files without further notice or liability.

Regarding any other personal information we have processed, we will keep your personal data for as long as we need it for the purpose it is being processed for and in compliance with our obligations under the EU General Data Protection Regulation 2016/679 (or similar legislation around the world). We may then destroy such files without further notice or liability.

If any personal information is only useful for a short period (e.g. for a specific marketing campaign), we may delete it at the end of that period.

9. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

All our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above) who have access to and are associated with the processing of personal information are obliged to respect the confidentiality of the personal information of all users of our Site.

10. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal information we hold about you:

- **Your right of access**

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.

- **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to removal**

You can ask us to delete or remove your personal information in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal information with others, we will let them know about your request or withdrawal where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

- **Your right to restrict processing**

You can ask us to block or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information, though. We will tell you before we lift any restriction.

If we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

- **Your right to data portability**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you have provided to us (in a structured, commonly used and machine readable format) and to re-use it elsewhere or to ask us to transfer it to a third party of your choice.

- **Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are relying on our own legitimate interest to process your personal information, except if we can demonstrate compelling legal grounds for the

- **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by sending a message using the "Contact Us" section above or by clicking on the unsubscribe link in any marketing email.

- **Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal information, please contact us using the contact details provided in the "Contact Us" section above. You can also report any issues or concerns to the Information Commissioner's Office (ICO). You can find details about how to report a concern on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

12. CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes to comply with changes in the law or regulatory

requirements. We will notify you by email of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.

Last Updated: 29 November 2019