

The following document outlines the Privacy Policy for the COMPROLATINO.COM website.

## Introduction

Choosing to shop with COMPROLATINO.COM means you've placed a great deal of trust in us. In sharing your personal information we hope you in return benefit from a tailored and convenient shopping experience. With trust comes responsibility and we take this responsibility very seriously.

This Privacy Notice helps you to understand how we use your personal information, who we share it with and the rights that you have. For more information on your rights and how to exercise them, head straight to the Your Rights section later in this document.

This Privacy Notice applies if you shop on any of the COMPROLATINO.COM retail websites or if you otherwise share your personal information with us, for example if you contact us with a query or we send you marketing.

We change the terms of this Privacy Notice from time to time and you should check it regularly. If we make any material changes we will take steps to bring it to your attention.

## Who we are

We are COMPROLATINO.COM Retail Limited (“we”, “our”, “us”) and operate under COMPROLATINO.COM.

We are the data “controller”, which means we are responsible for deciding how and why your personal information is used. We’re also responsible for making sure it is kept safe, secure and handled legally.

We operate to the highest standards when protecting your personal information and respecting your privacy

## Your rights

You have a number of ‘Data Subject Rights’ below is some information on what they are and how you can exercise them. There is more information on the Information Commissioners website [ico.org.uk](https://ico.org.uk)

- Right of access – You have the right to request a free copy of the personal information that we hold about you.
- Right to rectification – If you think any of your personal information that we hold is inaccurate, you have the right to request it is updated. We may ask you for evidence to show it is inaccurate.
- Right to erasure (also known as the Right to be Forgotten) and the Right to restriction of processing – You have the right to request that we stop processing, or delete, all of your personal information that we hold. If you exercise this right we will keep a note of your name linked to your request and it won’t prevent us from processing any new information you provide to us subsequently.
- Right to data portability – You have the right to ask us to electronically move, copy or transfer your personal information in a machine readable format.
- Rights with regards to automated decision making, including profiling – We sometimes use your personal information to make decisions by automated means. This involves us analysing your account activity including applications, orders, payments etc. We do this to confirm your identity, prevent and detect crime, and lend responsibly. This automated decision making is necessary if you would like to continue to shop with us online. You have a right to reject automated decisions but it may mean that you can only shop with us in our stores.

- Right to withdraw Consent – Where we are relying on your consent for processing you can withdraw or change your consent at any time.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, or if we have compelling legitimate interests to keep it. We will let you know if that is the case and will then only use your information for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal information.

If you have any general questions or want to exercise any of your rights please contact [dataprotection@COMPROLATINO.COM](mailto:dataprotection@COMPROLATINO.COM). Our security procedures mean that we may need to request proof of identity before we disclose personal information to you in response to any request.

## **The lawful bases we use to process data**

We will only ever process your information if we have a lawful basis to do so. The lawful bases we rely on are;

- Contract – This is where we process your information to fulfil a contractual arrangement we have made with you.
- Consent – This is where we have asked you to provide explicit permission to process your data for a particular purpose
- Legitimate Interests - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way.
- Legal Obligation – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime or to meet responsible lending criteria

## **The information we collect and how we use it**

We collect and use the information that you provide to us directly, for example when you register for an account; we also use cookies and other similar technologies to collect information from your devices when you interact with our advertising or use our website; we keep records when you speak to our customer service teams; and we take personal information from a number of third parties to help us manage your account and improve your shopping experience. For more detailed information you can read the below which outlines how we use your personal information:

### **To process any orders that you place with us and to facilitate any returns (Contract)**

- We take payment details to process payment for any credit or debit card orders you place with us. We share these details with our chosen payment processors (for example Worldpay or Paypal)
- We use your account information plus your chosen delivery address details to; deliver your purchases and keep you informed of their status, and to process any returns including (where appropriate) collecting the item from you.)
- Our chosen payment processors store your payment card details at your request to speed up your checkout in the future (consent)

### **To provide you with access to an account (Contract)**

- To register an account with us we capture information such as your name, date of birth, contact and delivery information, and a password to protect your account (account information). We use the same information on an ongoing basis to manage and provide secure access to your account, and provide you with the services you request.

**To provide customer service to you (Legitimate interest)**

- We record calls and keep correspondence (customer service records) when you contact our customer service teams or interact with us on social media. We use these customer service records to manage your queries or complaints effectively, for quality monitoring and to continually improve our services

**To offer and manage any credit we provide to you (Contract & Legitimate Interest)**

- When you apply for and use credit with us we will use your account information to make searches with third parties who will give us information about you, such as your financial history. We do this to assess your creditworthiness and product suitability.
- We use purchase history and payment history, along with your account information, on a cyclical basis to manage your credit facility with us.
- We use your account information, purchase history, payment history and third party information to collect and recover money that is owed to us should your account fall into arrears.

**To personalise and improve your experience when you shop (Legitimate Interest)**

- We keep a record of how you interact with our website and any marketing you are exposed to, we use this data, along with purchase history, demographics, account information and third party information, to show you products and offers that we think you will be most interested in and to tailor your experience.
- We use your account information, information on the devices you use to access our sites and your interactions with us to operate personalised features across our websites, apps and communications

**To inform you about products and services that may interest you (Legitimate Interest)**

- We use technologies such as cookies within digital marketing networks, ad exchanges and social media networks such as Facebook's Custom Audience to get relevant marketing messages across to you and other customers. We share aggregated and anonymised information about the customer segments we are interested in reaching with advertising partners, so they can focus on showing adverts to those who are most likely to be interested in our products, services and offers, and to prevent them showing you irrelevant or repetitive advertisements.
- We share limited information with selected suppliers to enable them to identify new prospective customers on our behalf and to prevent us repeatedly advertising products or services you have already bought
- We receive information on how you interact with our adverts and content on third-party websites and social media platforms (such as Google or Facebook) which we use to tailor the information that is displayed to you.

**To keep in touch with you (Legitimate Interest)**

- When you register for an account and shop with us we start to keep you up to date with news of products and services including store events, offers, promotions and Sale information, unless you tell us you don't want us to through your account or using the link in every email that we send to you.
- When we send you communications we use records of how you interact with our website and any other marketing we've sent to you, along with purchase history, to tailor the messages to include information you are most likely to be interested in.

- We use your account information to notify you about important service messages, such as material changes to this policy, product recalls or information about your account.
- Where you have requested it we use your account information to deliver COMPROLATINO.COM Directories to you.

*n.b. If at any point you have made amendments to your contact preferences in the 'my account' section of our website, selecting to receive communications from us, we are operating under consent instead of legitimate interest.*

**To ensure the Website and the services we offer you operate properly (Legitimate Interest)**

- We use cookies and other similar technologies to keep track of your preferences when using our site.
- We use other cookies and similar technologies to help us understand how you use the site, this allows us to optimise your shopping experience and continually improve our site.
- We gather information about the devices you use to access our sites (desktop and mobile) for example your IP address and device type, to ensure the site is secure and works across multiple platforms.
- We use information for Logistics planning, demand forecasting, management information, dealing with errors on our site, and general research and development.

**To develop and improve our products, range and services (Legitimate Interest)**

- We share insights about our customers (in an anonymised and aggregated format) with the companies whose products we sell. This helps them better understand the different profiles of our customers, focusing on those who buy their products or are interested in them.
- We may contact you to take part in customer satisfaction surveys, if you respond we collect your feedback and contributions (customer feedback). We use this information to develop the services we offer.
- We work with information providers that specialise in consumer profiling. These organisations provide demographic or other data to help better understand customers' demographics, lifestyles or shopping behaviours, usually linked to the areas where people live.
- We use information about how you browse and engage with our website to improve our websites.
- We use all information, including third party data in the development of new products, services and systems to ensure they work as expected and will be useful to our customers.

**To prevent and detect crime (Legitimate interest/Legal obligation)**

- We use your account information, order history and payment history to assist in monitoring for fraudulent transactions or suspected money laundering.
- When you register an account, apply for credit or contact our call centres we use your account, application and purchase history information to confirm your identity.
- We use device identifiers and IP addresses in fraud prevention and investigation, and to maintain network and data security.

**To fulfil our legal obligations (Legal obligation)**

- We use your data to ensure we comply with any requirements imposed on us by law or court order, including disclosure to law or tax enforcement agencies and authorities or pursuant to legal proceedings.
- We will share data with regulatory and other official bodies if they make formal requests.
- We will maintain records to meet regulatory and tax requirements.
- We will use your account information to contact you in connection with product recalls or other similar product quality issues and to comply with our legal obligations in connection with the sale of age restricted products.

**How long we keep it for**

We keep your personal information as long as you are a customer of ours and generally for seven years afterwards to comply with legal requirements. During that time we take steps to remove any personal data as soon as we no longer need it.

We consider you a customer

- as long as you hold an open credit account,
- for 2 years from the point you last made a purchase from our website using a non-credit account, or
- during any time we are managing a customer service request from you.

**Third Parties we share data with and receive data from,**

We work with a number of trusted third parties to provide you high quality goods and services. Anybody we work with is subject to stringent security and data privacy assessments before we begin to do business with them and on an ongoing basis.

We always make efforts to anonymise data and only pass over personal information that is absolutely necessary for the purposes it is being processed. We always do so securely.

We have contracts in place with all suppliers that help us to ensure security and privacy of your personal information, these are reviewed and updated regularly and always in line with data protection laws.

- Delivery Partners – helping us to deliver the goods you order to you including our brand partners that dispatch and deliver goods to you directly.
- IT Companies – supporting us in maintaining our website and other business systems including; providing phone lines, data storage facilities, and providing and supporting Cloud based infrastructure used in providing our products and services.
- Marketing Companies and Online Advertising - helping us to manage our electronic communications to you and to help us show you the advertising you are most likely to be interested in, Companies that provide marketing and advertising assistance (including management of email marketing operations, mobile messaging services such as SMS, and services that deploy advertising on the internet or social media platforms, such as Facebook and Google) as well as analysis of the effectiveness of our advertising and communications campaigns.
- We use technologies such as cookies, pixels, and device ID's within digital marketing networks, ad exchanges and social media networks such as Facebook's Custom Audience to get relevant marketing messages across to you.

- Consumer profiling organisations - These organisations provide demographic or other data to help better understand customers' demographics, lifestyles or shopping.
- Payment processors - Payment card processors to process credit and debit card payments and store payment information; for example Worldpay and Paypal.
- Credit Reference Agencies (CRAs) - We share your personal information with CRAs on an ongoing basis, including detail of settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations.

We also take information from CRAs to allow us to make decisions about your credit account and credit facility.

- Fraud prevention services - Before we provide goods and services to you, we use third parties to undertake fraud and money laundering checks and verify your identity. These organisations will report to us on industry fraud indicators and if they have reason to believe an identity is fraudulent.

If we have reason to suspect fraud or other criminal offences we will pass your personal information to fraud prevention agencies (such as CIFAS) or law enforcement agencies for the detection, investigation and prevention of crime. If we think there is a risk of fraud, we may suspend activity on your account or refuse access to your account and/or cancel an order. If we do this we will inform you by email or SMS and ask you to contact us.

- Debt collection agencies (DCAs) - If you default on repayments to your credit account we may share your data with DCAs to allow them to collect the outstanding debts from you.
- Debt purchase companies – Where appropriate will share certain information on defaulted accounts with prospective debt purchasers as part of the negotiations for sale of the Debt.
- Debt management companies – where we have received appropriate information we will share information about your credit account with debt management companies, to allow them to assist you with managing your debts.
- Research and analytics companies - We may share personal details to allow research companies and feedback providers to contact you directly on our behalf in order to capture your opinions on our products, services, websites and apps. We may ask these research companies to analyse the results so that we can better understand your online experience, which will help us to improve our services. We only provide them with the information they need to perform their function. This may take the form of a survey, where you may be asked to review a product or service you've bought or provide general feedback on our products and services. You will always have the choice about whether to take part in our market research or surveys.

We may share information with specialist companies to analyse customer information to help us better understand how you use our services and to tailor products, services and offers that may be relevant for you.

We utilise companies that help us track and record the way you navigate our website, so that we can understand your online experience and use it to improve our services and offer a more personalised experience.

- Product technicians – we use professional third party companies to assist us in independently reviewing issues and complaints with our products. We will share information with these technicians to allow them to review the product and return it to you or to review the product in your home.
- General service companies - such as printers and mailing houses that assist us in providing our products and services.
- Regulators and the Police - We will share data with regulators and other official bodies (including law enforcement) if they make formal requests or pursuant to legal proceedings.

#### **Sending information outside the European Economic Area**

Our main operations are based in the UK and your personal information is generally processed, stored and used within the UK and other countries in the European Economic Area (EEA). In some instances your personal information may be processed outside the European Economic Area. We also work with suppliers and partners who may make use of Cloud and /or hosted technologies across multiple geographies.

If and when this is the case we take steps to ensure there is an appropriate level of security so your personal information is protected in the same way as if it was being used within the EEA.

Where we need to transfer your data outside the UK or EEA we will use one of the following safeguards:

- The use of European Commission approved standard contractual clauses in contracts for the transfer of personal data to third countries.
- The transfer to organisations that are part of the EU-US Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.
- Transfers to a non-EEA country with privacy laws that give the same protection as the EEA.

You can find out more about the above data protection safeguards on the European Commission Justice website.

#### **Third-party apps, websites and services**

If you use any third-party apps, websites or services to access our services, your usage is subject to the relevant third party's terms and conditions, cookies policy, and privacy notice. For example, if you interact with us on social media, your use is subject to the terms and conditions and privacy notices of the relevant social media platform (Facebook, Twitter etc.). The same stands if you use third-party services, like Amazon's Alexa, as your use of the service is subject to their applicable terms and conditions. We may be required to share customer information relating to transactions and use of such third party services with that third party.

#### **How you can get in touch**

Should you need to contact us please write to:

via [dataprotection@COMPROLATINO.COM](mailto:dataprotection@COMPROLATINO.COM)