Privacy Policy

By using our site, you consent to our online Privacy Policy. Your consent is further provided when you register as a user.

This Privacy Policy was last updated on 23 May 2018.

Table of Contents

- 1. Introduction
- 2. Data Protection Officer and Data Controller
- 3. Purpose of the Processing and the Legal Basis for the Processing

4. What categories of personal data we collect, how we collect and use (process) it and for what purpose(s)

- 5. Your Rights
- 6. Questions, Concerns and Complaint with a Supervisory Authority
- 7. Disclosure of Personal Data
- 8. Direct Marketing
- 9. Transfer of Personal Data within the EU
- 10. Security of Personal Data
- 11. Retention
- 12. Terms of Use of this Website and Cookies
- 13. Changes and Updates to this Privacy Policy
- 14. Contacting Us

<u>1. Introduction</u>

We recognise the importance of protecting the privacy of personal data or personally identifiable information, being information which relates to an identifiable individual ("Personal Data") about the users of and visitors to our website. We respect the rights of such users and visitors and the obligations imposed by applicable law and are

committed to protecting your privacy in accordance with the Data Protection Acts of 1988 and 2003 (together with Data Protection Directive 95/46/EC) and General Data Protection Regulation ("GDPR") as implemented in UK, the ePrivacy Directive and other applicable law, the "Data Protection Acts") and Statutory Instrument 336 of 2011 - European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011. The following Privacy Policy discloses what information we gather, how we use it, and how to correct or change it.

Our website, products and services are all directed to people who are at least 16 years old or older. However, you may purchase our products even if you are under 16 years old with the consent of an adult. That adult will be asked to consent to our processing of your Personal Data on your behalf.

We reserve the right, in our sole discretion, to modify, alter or update our Privacy Policy at any time. Such modifications, alterations, and updates shall be effective immediately upon posting. Your continued use of this website following the posting of a modified, altered, or updated Privacy Policy will mean you accept those modifications, alterations or updates.

2. Data Controller, Data Controller's Representative, Data Protection Officer

2.1 The Data Controller controlling the means of processing of your Personal Data and the purposes of such processing is:

Bogod & Company Limited

Regd. In UK at 91 Goswell Road, London, EC1V 7EX

Regd. Co. No. 00600493

Tel: +44 (0) 20 7549 7860

Email : info@bogod.com

Please use these contact details for any queries regarding privacy and data protection by this company.

2.2 Where one of the Bogod & Company group companies is responsible for processing personal data outside the EU, Bogod & Company registered in England is its EU representative.

2.3 Where Bogod & Company makes supplies to a third party retailer and your contract is with that retailer directly, Bogod & Company is the data processor and you are referred to the retailer which is the data controller where you have queries about your personal data.

3. Purpose of the Processing and the Legal Basis for the Processing

We gather two types of information in the operation of this website and provision of services to you:

1. Personal Data:

We collect information from you when you:

i. Contact Us by email or telephone or seek to complete and order on our site by filling out a form.

ii. Place an order through one of our retail agents

iii. Attend or complete an order with us in person at one of our trade exhibition stands

iv. Ask us to open your account with us to remain open regardless of purchases

v. If you visit our premises, your image may be caught in CCTV and the footage retained for our legitimate purposes

vi. Apply for or accept a job with us

vii. Contact us as a business to business contact or supplier.

When registering with us in any of these ways or sending emails, submitting your CV, requesting newsletters / blogs or providing feedback, you may be asked to enter your: name, e-mail, address and/or telephone number information as appropriate. In order to compete delivery of an order, we shall require your mobile telephone number. This information will only be used by us in accordance with the terms herein, to enable us to contact you and discuss what services we can provide to you. In any event, however, we require this personal data in order to be able to complete our contractual obligations to you.

When you contact us, you will be asked clearly to tick consent to our processing of necessary categories of Personal Data, for each contractually agreed purpose we are to provide, as set out in our Consent Policy. Your consent will also enable you to participate in offered features of our service and notify you about changes to the service.

The provision of your Personal Data is voluntary. However, if you do not provide us with the required Personal Data, we may not be able to provide you with the product/service you requested.

2. Non-Personal Data:

We may collect information about your visit to and use of this site, including sales data, traffic data and related site information. This information helps us to evaluate and improve our site and may also be used for investment analysis purposes. As Non-Personal Data does not personally identify you, we may use it for any purpose.

Bogod & Company Limited 91 Goswell Rd London EC1V 7EX 0207 549 7860 4. <u>What Categories of Personal Data we collect, How We Collect and Use</u> (process) it and for What Purpose(s)

4.1 Categories. With a few exceptions, this information is limited to the kinds of information that are necessary to complete a contract with us: first name, last name, postal address, email and mobile phone number (and your image if you attend our premises and your image is caught on CCTV). We also collect payment card details as necessary to facilitate your online purchases.

4.2 How We Collect It. We collect your Personal Data as this Privacy Policy further describes when you use our website, register or contract with us or with one of our retail distribution partners. We also collect information from you with your consent from your attendance at trade exhibitions and fairs when you wish to make an order or ask to receive news of promotions and latest products.

4.3 What We Use Your Personal Data For

We collect information from you which may be used for the following listed purposes. This is not a definitive list and may change from time to time. Please confirm your consent when you register/place and order or contact us for the first time on the table then provided.

4.4 When you attend an exhibition or trade fair for which you have registered electronically, you may have been invited to provide your Personal Data to us and consented to our use of such data for e-marketing purposes; you may withdraw such consent at any time by contacting us.

Purpose

Process and administer your Personal Data and process transactions, fulfil your requests, orders and/or to provide other information you requested. *We require this Personal Data in order to be able to complete our contractual obligations to you.*

Where you have contracted with us through one of our retail agents, they are a third party Data Processor providing that service on our behalf; they shall process Personal Data in accordance with that our instructions, as controlled by us and *as necessary to complete our contractual obligations to you*.

Complete delivery of your order. *We require this Personal Data in order to be able to complete our contractual obligations to you.*

Retain order details for repeat orders and/or when you open an account with us and where you request us to do so

Personalize your experience

Improve our website and make the website easier for you to use

Improve customer service

To respond to your enquiries or comments submitted through our website

Send periodic emails (Please see Direct Marketing below)

Notify you about important news or blogs concerning our products, industry updates, events, promotions and competitions, reports and other information

Match Personal Data with third party data. Also, we may keep track of what portions of the website users are visiting and other user statistics, and aggregate this information to help us create a better experience for users of our website. This is all done in order to describe our products and services to prospective partners, advertisers, and other third parties, and for other lawful purposes.

Promote our products and services on our website and third party partners' websites

Provide you with information about products and services that you request from us or, where you have consented to be contacted, for such purposes which we feel may interest you

To obtain your feedback

To permit applications for employment with us and related activities to such applications

Create statistical reporting regarding our web activities

In addition, in order to carry out our lawful activities and for legitimate purposes, we may collect and process your Personal Data to:

Allow you to use interactive features on our website or applications;

Retain a record of incoming and outgoing communications (e.g. email);

Protect the security and integrity of the website;

Prevent and detect fraud or other prohibited or illegal activity;

In response to a court order, request for cooperation from a law enforcement or other government agency;

To establish or exercise legal rights; To bring or defend legal claims;

For responsible corporate governance or as otherwise required or permitted by applicable laws and/or regulations;

In circumstances in which we believe disclosure is appropriate in connection with fraud prevention and prevention of other illegal, or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations;

To protect and defend the rights, property or safety of Bogod & Company and/or other companies in the Bogod & Company group, its/their investors and other clients, staff, and/or service providers.

We continually strive to improve our website offerings based on the information and feedback we receive from you. Your information helps us to respond more effectively to your requests and support your needs. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

5. Your Rights in respect of your Personal Data:

This Privacy Notice is intended to provide you with information about what Personal Data Bogod & Company collects about you and how it is used. If you have any questions, please contact us.

If you wish to confirm that Bogod & Company is processing your Personal Data, or to have access to the Personal Data we may have about you, please contact us.

You have various rights in respect of your Personal Data which can be summarised as follows:

1. The right to be informed. Where we intend to collect your Personal Data, you have a right to consent or object to such collection for the intended purposes. In respect of each intended purpose you will be asked to tick box to indicate your consent to each intended purpose for processing of your Personal Data.

2. The right of access. You may request to receive a copy of any Personal Data held by us, which personally identifies you. We may in some circumstances charge an administration fee to cover the cost of carrying out your request. We may ask you to verify your identity and for more information about your request.

3. The right to rectification. We will correct or erase inaccuracies in the information we hold about you when we learn of the inaccuracy.

4. The right to erasure. Personal Data may be erased if we do not have a legitimate reason for retaining the information.

5. The right to restrict processing;

6. The right to data portability;

7. The right to object;

8. Rights in relation to automated decision making and profiling. We do not carry out any automated decision making.

Please contact us in writing with any requests and provide verification that you are who you say that you are.

You may withdraw your consent to your Personal Data being processed at any time (the opt out button is available next to the opt in button where you provided your consent). However, if you withdraw consent, we may not be able to provide you with the product/service which you requested, as this policy indicates.

6. The Right to Lodge a Complaint with a Supervisory Authority

If you have a reason to complain about how your personal data has been controlled and processed by Bogod & Company, please in the first instance contact us and we shall endeavour to resolve your queries promptly. If you remain unsatisfied, you may lodge a complaint with:

Office of the Information Commissioner

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: +44 303 123 1113 or 01625 545 745

Email: casework@ico.org.uk

Please copy any such communication to us so that we can work to resolve any outstanding issues promptly.

7. Disclosure of Personal Data

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the product or service requested.

We may disclose your Personal Data within the Bogod & Company group, to our third party suppliers (where applicable), our retail agents where you contract with them as our agents, professional advisers, and to such other third parties as may reasonably be required in connection with the purposes referred to in this Privacy Policy, such as operating our website, conducting our business, distributing products to you, so long as those parties agree to keep this information confidential. We reserve the right to disclose any and all pertinent information to law enforcement or other governmental officials as we, in our sole discretion, believe necessary or appropriate.

The disclosures of your Personal Data described in this Privacy Policy may, if you are outside of the European Economic Area (EEA), involve the transfer, storage or processing of your Personal Data to such country, where the level of data protection is not as high as in the EEA. By providing us with your Personal Data in such circumstances you agree to such transfers of your Personal Data. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

We may also disclose Personal Data in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms of Service, or may be causing injury to or interference with any of our rights or property, other users, or anyone else. We may disclose or access account information when we believe in good faith that the law requires it and for administrative and other purposes that we deem necessary to maintain, service, and improve our products and services.

8. Direct Marketing

On occasion, we engage third parties to mail or send information to you, including items about products you may have purchased, or material from an event sponsor. We have a legitimate interest in processing of Personal Data for direct marketing purposes. We may send postal marketing about a new product; you may opt-out of this. In the context of a sale, we may have sought your consent for electronic marketing, but again you may opt out of this at any time by following the instructions in the marketing communication itself or by contacting us through this website.

9. Transferring Personal Data to the EU

The personal information we collect from you is stored in one or more databases hosted by third parties located in the United Kingdom. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval. Any other third parties within the EU (but outside the UK) will only have access to your personal Data as our data processors and on our instructions when you have requested a delivery from us within the EU.

10. Security of your Personal Data

To help protect the privacy of data and personally identifiable information you transmit through use of this site, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your Personal Data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

<u>11. Retention Period</u>

We shall retain and store your Personal Data securely and for as long as necessary in order to fulfil our and our distributors' (where applicable) contracts with you and to reflect the length of any warranty provided. Where we have been provided with your mobile telephone number in order to arrange delivery, that telephone number shall only be retained for a maximum of one calendar month after delivery. We shall then only retain other Personal Data for as long as necessary to comply with our legal obligations under relevant law.

In addition, where you have opened an account with us and requested that we retain your Personal Data, it shall be retained securely using appropriate technological and organisational measures whilst that account remains open, until you opt out of such storage and you request closure of the account.

CCTV footage when you visit our premises is retained for 7 days or longer if necessary for our legitimate interests and/or to comply with the law.

For more information on where and how long your Personal Data is stored, and for more information on your rights of erasure and portability, please contact us.

12. Terms of Service and Cookies

Please also visit our Terms of Service section establishing the use, disclaimers, and limitations of liability governing the use of our website.

As is true of most other websites, our website collect certain information automatically and store it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the our website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. Our website also uses cookies and web beacons. It does not track users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track (DNT) signals.

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Cookies make web-surfing easier for you by saving your preferences so that we can use the saved information to facilitate your use of our website when you return to the website. The use of cookies is an industry standard, and as such, you will find that most major websites use them.

We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Bogod & Company Limited 91 Goswell Rd London EC1V 7EX 0207 549 7860 Please see our Cookie Policy For More Detail.

13. Changes to our Privacy Policy

If we decide to change our Privacy Policy, we will post those changes on this page. We reserve the right to amend the Privacy Notice and Terms of Service at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice and Terms of Service at this site. We may e-mail periodic reminders of our notices and terms and conditions and will e-mail deployment partners of material changes thereto, but you should check our site frequently to see the current Privacy Notice and Terms of Service that is in effect and any changes that may have been made to it.

14. Contacting Us

If there are any questions regarding this privacy policy you may contact us.

Bogod & Company Limited 91 Goswell Rd London EC1V 7EX 0207 549 7860 Cookie Policy

When you first use this site, once you take any action at all, you will consent to the cookies being enabled. You will receive notification to this effect.

We respect the privacy of all visitors to our website. This Cookie Policy outlines our policy concerning the use of cookies on this website. We may update our Cookie Policy from time to time to reflect any changes in technology or legislation which may affect the way in which cookies are used by us and how you as a user, can manage them and we will publish any updates on this website.

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Cookies make web-surfing easier for you by saving your preferences so that we can use the saved information to facilitate your use of our website when you return to the website. The use of cookies is an industry standard, and as such, you will find that most major websites use them.

We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Most cookies expire after a defined period of time, or you can delete your cookie file at any time. Most web browsers are initially set up to accept cookies. You can reset your web browser to disable cookies or to indicate when a cookie is being sent. However, note that some parts of our Service may not function properly or may be considerably slower if you refuse cookies. Additional information about cookies, including opting-out of certain cookies, please visit: <u>www.aboutcookies.org</u>.

When you use this website the following types of cookies can be set on your device:

1. Strictly Necessary Cookies

These cookies enable Services that you have specifically asked for. These cookies do not usually contain any personally identifiable information and are typically set by websites to provide services such as eCommerce and log in facilities. For example, these cookies identify you as being signed in to websites and enable you to remain logged in throughout your visit;

Our content management system (CMS) uses session cookies that cannot be disabled.

2. Performance Cookies

These cookies are used to collect statistical information about visitors of the website and the pages they view.

These cookies do not collect information that identifies a visitor. The information these cookies collects is aggregated and used anonymously. We use these cookies to understand what content is popular which helps us to improve our website.

3. Functional Cookies

These cookies allow the website to remember choices you make and provide enhanced and more personal features. Some examples of such features include:

- Remembering your preferences and settings such as redirect to mobile version of the site when you are browsing with a smart phone
- Remembering your favourites and user preferences when browsing particular websites and for future visits
- Help remember and process the items in the shopping cart

If you have an account on a particular website, a cookie on your computer lets the website remember your user name and email address so you don't have to enter it again when you are commenting or writing a review.

4. Targeting and Advertising Cookies

These cookies are used to deliver advertising that is more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with our permission. They remember that you have visited a website; this information is shared with other organisations such as advertisers. Often targeting or advertising cookies will be linked to site functionality provided by the other organisation. Some examples of services that use these types of cookies include Google AdSense or DoubleClick. If you wish to opt-out of targeting and advertising cookies please visit: www.youronlinechoices.com/ie/your-ad-choices

We do not use such targeting and advertising cookies, but our partner Bernina International AG may do so and you are referred to their privacy policy.

5. Other Third Party Cookies

Some cookies that have been set on our websites are not related to us. When you visit a page with content embedded from, for example, YouTube or Facebook, these service providers may set their own cookies on your web browser. We do not control the use of these cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. You should check the third party websites for more information about these cookies.

Google

We have implemented Demographics and Interests Reporting, and Google Advertising Features including remarketing.

• We will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through any Google advertising product or feature unless we have robust notice of, and the user's prior affirmative consent to, that merger.

We along with third-party vendors, such as Google use first and third-party cookies and anonymous identifiers to compile data regarding user interactions with our website. It's also important to note that we allow third party behavioural tracking to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

You can opt out by visiting the Network Advertising initiative opt out page or using the Google Analytics Opt Out Browser add on - <u>https://tools.google.com/dlpage/gaoptout/</u>