

Data Protection Privacy Notice

Notice Date: 24/5/2018

Sewell is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your customer relationship with us, in accordance with the General Data Protection Regulations 2018 (GDPR). It applies to all customers including our loyalty scheme.

As a company we operate many systems and manage a wide array of information. Within this, Sewell will be recognised under GDPR legislation as a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you.

It's likely that we'll need to update this Policy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check whenever you wish.

It is important that you read this notice so that you are aware of how and why we are using such information.

Personal data protection principles

The company adheres to the principles relating to processing of Personal Data, as set out in the GDPR which require Personal Data to be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold 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 will collect, store, and use the following categories of personal information about you:

- Your personal contact details such as name, title, address, telephone number, and personal email address.
- Your Date of birth and Gender.
- You may be recorded on CCTV when you visit a shop which includes voice recordings.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

- Details of your interactions with us through our stores.

There are "special categories" of more sensitive personal data which require a higher level of protection. We currently do not collect, store or use any 'special category' information about our customers.

How is your personal information collected?

- When you join our loyalty programme (My Rewards).
- When you sign up to My Rewards you will be given access to an area on myrewards.com
- When you contact us by any means with queries, complaints etc.
- When you enter prize draws or competitions.
- When you fill in any forms. For example, if an accident happens in store, a staff member may collect your personal data.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- **Consent.** In specific situations, we can collect and process your data with your consent. For example, when you tick a box to receive email newsletters.
- **Legal Compliance.** If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting the company to law enforcement.
- **Legitimate Interest.** In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers. We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

Situations in which we will use your personal information

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. In the case of loyalty scheme members, we'll also offer you relevant rewards.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.
- To protect our customers, premises, and assets from crime, we operate CCTV systems in our stores and forecourts which record images for security. We do this on the basis of our legitimate business interests.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web and text about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.
- We will use your address to send you your MyRewards Card and any replacement card in the future.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites using 'https' technology.

Access to your personal data is password-protected

How long will you use my information for?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Who do we share your personal data with?

We sometimes share your personal data with trusted third parties for example for legal purposes eg with the police/insurance companies.

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We use a third party as a data processor for our MyRewards loyalty scheme. A contract is in place with this provider to ensure that the level of security required is in place so that your personal data is processed only as instructed by us. This data processor resides in the EU.

In certain circumstances we may need to share your personal information with a third party for example in relation to a query about a product from a supplier. In this event we would ask for permission to share that information.

Where your personal data may be processed?

EU only.

Rights of access, correction, erasure and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Under certain circumstances, by law you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Right to withdraw consent

In the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

There are several ways you can contact us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.
- Reply to the Opt Out SMS number supplied on every text
- If you have an account, log in into your My Rewards account, visit the 'My Account' area and change your preferences.
- E-mail or write to us on the contact details below

MyRewards@Sewellonthego.co.uk

Sewell Retail Limited
Geneva Way
Leads Road
Hull
HU7 0DG

To withdraw your consent, please contact us and once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.