

## Privacy & Cookie Policy

This Privacy Policy describes how your personal information is collected, used, and shared when you visit or make a purchase from <https://johnpaulfashions.com> ("site")

**1. Personally Identifiable Information:** Information that can be used to identify you, may also be referred to as "personal data" or "personal information". Personally Identifiable Information include information such as your name, email address, IP address, phone numbers and device identifier, among other things. You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit. Inaccurate information may affect our ability to contact you.

**2. By what means is this information collected?** The information is collected through the details of your visits to our Site, including, but not limited to cookies, weblogs, surveys, web forms, registration for an event, newsletter sign-up, to place an order

**3. Cookies:** We collect information about your use of our Site through cookies. Cookies are information that files stored on your computer, tablet or Smartphone that help websites remember who you are and information about your visit. Cookies can help to display the information on our Site in a way that matches your interests. Most major websites use cookies.

The cookies we and our business partners use on our Site are broadly grouped into the following categories:

- **Essential** – Some of the cookies on our Site are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our Site or which allows communication between your browser and our Site. Our cookie preference cookie described in the section "How can I reject or opt out of receiving cookies?" is also an essential cookie. You may not be able to use our Site without these cookies.
- **Analytics** – We use analytics cookies to help us understand how users engage with our Site. An example is counting the number of different people coming to our Site or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited our Site once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our Site was performing and improve it without these cookies. We also use Google Analytics or other analytic tools to help us understand how our customers use the Site--you can read more about how Google or analytic uses your Personal Information
- **User Cookies** – We use cookies to improve your experience by remembering your preferences so we know how you like to use our Site. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our Site.
- **Social Sharing** – We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to "like" or "tweet" about us or our products or services. Please see our "Third Party Cookies" section below for more details.

- **Interest-Based Advertising** – You will have noticed that when you visit websites you will be shown adverts for products and services you may wish to buy. The money made by website owners for showing third party adverts on their websites often pays for the cost of running the website and therefore usually allows you to use the website without having to pay a registration or usage fee. To try and ensure that the adverts you see are relevant to you third party cookies may be used to collect information about the types of things that interest you, for example websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant. Please see our “Third Party Cookies” section below for more details.

**4. What You Agree to by Using Our Site:** We consider that the legal bases for using your personal information as set out in this Privacy Notice are as follows:

- Our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the Terms of Use of our Site which you accept by browsing our website and/or to comply with our contract to provide Services to you); or
- Our use of your personal information is necessary for complying with our legal obligations; or
- Use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:
  - Run, grow and develop our business,
  - Operate our Site and provide our Services,
  - Select appropriately skilled and qualified suppliers,
  - Build relationships with partners,
  - Carry out research and statistical analysis,
  - Carry out marketing and business development,
  - For internal administrative and auditing purposes and
  - Consent, to send you certain communications or where you submit certain information to us.

Which legal basis applies to a specific processing activity will depend on the type of personal information processed and the context in which it is processed.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by visiting your profile page and clicking the box to remove consent or delete your account and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide our Services to you.

**5. How we use your personal data:** We use your personal data for the following purposes:

- **To provide you with the products and services you have requested:** We use your personal data to accept you as a new or returning customer to provide you with the products and services you have requested in accordance with the Trading Terms or Terms of Trading.

- **To send you service communications, including in relation to changes to our Trading Terms or Terms of Trading:** We use the contact details you have provided to us so that we can communicate with you about the products and services that we provide, including to let you know about major changes to those products and services or to the Trading Terms or Terms of Trading between us or to any related information.
- **Direct marketing (including by third parties):** If you have provided your consent or we otherwise have the right to do so, we may use your contact details to send you direct marketing and keep you informed of promotional offers by email, SMS, post or telephone relating to our products and services.  
You can unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us.  
Our trusted business partners would also like to use your name, email address, postal address and telephone number to inform you of similar products, services and promotional offers. We will only share your personal data with our partners where you have provided us with your consent to do so. You can unsubscribe at any time by clicking the “Unsubscribe” link in any of their emails or by contacting us.
- **To track your usage of our website, communications, products and services:** We use cookies and similar technologies to track your activity on our Site so that we can provide important features and functionality on our Site, monitor its usage, and provide you with a more personalised experienced.
- **To provide and improve customer support:** We use your personal data to be able to provide and improve the customer support we provide to you (for example, where you have questions about our products and services).
- **To maintain our records and improve data accuracy:** Like any business, we process personal data in the course of maintaining and administering our internal records. This includes processing your personal data to ensure that the information we hold about you is kept up to date and accurate.
- **To respond to enquiries, complaints and disputes:** We use the personal data we hold about you to help us respond to any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing our products and services to you, in the most effective manner.
- **To investigate, detect and prevent fraud and comply with our legal obligations:** In certain circumstances, we use your personal data only to the extent required in order to enable us to comply with our legal obligations, including for fraud detection, investigation and prevention purposes. This may require us to provide your personal data to law enforcement agencies if they request it.

## 6. Who we share your personal data with:

- We may provide your personal data to our suppliers and service providers, including other companies in our group, who provide certain business services for us and act as “processors” of your personal data on our behalf. In addition, we may disclose your personal data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property, or safety, of our business, our customers or others. This includes, in specific cases, exchanging information with other organisations for the purposes of fraud protection.
- In some cases, the personal data we collect from you may, for the purposes set out above, be transferred outside the European Economic Area (EEA) and such destinations may not have laws which protect your personal data to the same extent as in the EEA. We are required by data protection law to ensure that where we or our “processors” transfer your personal data outside of the EEA, it is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing

and any processing which is inconsistent with the purposes set out in this Privacy Policy.

**7. How long we keep your personal data:** We keep your Personally Identifiable Information for no longer than necessary for the purposes for which the Personally Identifiable Information is collected and processed. The length of time we retain Personally Identifiable Information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise, or defend our legal rights.

**8. Links to other websites:** Our website may contain hyperlinks to websites owned and operated by third parties. This Privacy Policy does not apply to those other websites. We encourage you to read the privacy statements on the other websites you visit, as they will govern the use of any personal data you provide when visiting those websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

**9. Confidentiality & Security of Personally Identifiable Information:** We consider the confidentiality and security of your information to be of the utmost importance. We will use industry standard physical, technical, and administrative security measures to keep your Personally Identifiable Information confidential and secure, and will not share it with third parties, except as otherwise provided in this Privacy Notice, or unless such disclosure is necessary in special cases, such as a physical threat to you or others, as permitted by applicable law. Because the Internet is not a 100% secure environment, we cannot guarantee the security of Personally Identifiable Information, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. It is your responsibility to protect the security of your login information. Please note that e-mails communications are typically not encrypted and should not be considered secure.

**10. Updating or Deleting Your Personally Identifiable Information:** You have certain rights in relation to your Personally Identifiable Information. You can access your Personally Identifiable Information and confirm that it remains correct and up-to-date, choose whether or not you wish to receive material from us or some of our partners, and request that we delete or provide you with a copy of your personal data by logging into the Site and visiting your user account page.

If you reside or are located in the EEA, you have the right to request that we:

- Provide access to any Personally Identifiable Information we hold about you,
- Prevent the processing of your Personally Identifiable Information for direct-marketing purposes,
- Update any Personally Identifiable Information which is out of date or incorrect,
- Delete any Personally Identifiable Information which we are holding about you,
- Restrict the way that we process your Personally Identifiable Information,

- Provide your Personally Identifiable Information to a third party provider of services, or
- Provide you with a copy of any Personally Identifiable Information which we hold about you. We try to answer every email promptly where possible, and provide our response within the time period stated by applicable law. Keep in mind, however, that there will be residual information that will remain within our databases, access logs, and other records, which may or may not contain your Personally Identifiable Information. Please also note that certain Personally Identifiable Information may be exempt from such requests in certain circumstances, which may include if we need to keep processing your Personally Identifiable Information to comply with a legal obligation. When you email us with a request, we may ask that you provide us with information necessary to confirm your identity.

## **11. Questions, Suggestions, and Complaints**

- If you have any privacy-related questions, suggestions, unresolved problems, or complaints, you may contact us as per the details on the website.
- If you reside or are located in the EEA, our Data Protection Officer and Privacy Team may assist with all queries regarding our processing of Personally Identifiable.
- If you're not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by writing to, calling to ICO or submitting a message through the ICO's website.

## **12. Changes to this Privacy Policy**

- This Privacy Policy may be updated from time to time, so you may want to check it each time you provide personal data to us.