

## Summary

# **Jack Nadel International ('JNI') is committed to protecting your personal data and handling it responsibly.**

This policy covers the personal data that JNI collects whenever you interact with us, including when you use our websites and apps and when you correspond with us (such as by email or over the phone). It also covers personal data that we may receive from third parties.

The sections below explain in more detail:

- **the types of personal data we collect from you**
- **why we process your personal data**
- **who we share your personal data with**
- **personal data transfers outside of the EEA**
- **how long we retain your personal data**
- **your rights to withdraw your consent and to object (including to direct marketing)**
- **your other personal data rights**
- **how to contact us and exercise your rights**

### **Personal data JNI collects from you**

We collect personal data from your interactions with us, such as when you engage with our websites and apps or when you email or phone us.

The personal data we may collect from you includes:

- the name and contact details that you provide when you register with us
- your payment and address details
- your marketing preferences, including any consents you have given us

- your browser or device information
- information about your use of our websites and apps
- your communications with us

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## **Why JNI processes your personal data**

This section explains the reasons why we process your personal data and our legal bases for doing so.

### ***Consent***

If you've opted-in to receive information and offers relating to branded products and/or our commercial partners (for example by ticking a box on one of our websites or apps), then we'll provide this information to you by email, text, or phone.

Wherever we rely on your consent to process personal data, you have a right to withdraw that consent.

### ***Legitimate interests***

We process your personal data when necessary to pursue our legitimate interests in the following:

- tailoring our websites and communications for you.
- monitoring, improving and protecting our products, content and services
- checking the credit or debit card details you provide (to process your payments and prevent fraudulent transactions)
- sending you some types of direct marketing, including by email
- responding to your comments or complaints
- querying whether you have had an issue completing an online form
- managing legal claims, compliance, regulatory and investigative matters
- You have a right to object to any processing that we undertake for our legitimate interests.

## ***Contract***

We process your personal data when necessary for contractual reasons, such as to administer your account registration and to provide products and services that you have requested.

## ***Legal obligation***

We are legally required to process your personal data in cases where we need to respond to certain requests by government or law enforcement authorities.

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## **Who JNI shares personal data with**

We will share your personal data with the following recipients:

- third party suppliers involved in: systems maintenance; database management; warehouse management; payment processing; delivery logistics; and credit and debt management
- government authorities or law enforcement officials, to assist with their official requests and comply with our legal obligations

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## **Personal data transfers outside of the EEA**

The EEA includes all EU countries, as well as Iceland, Liechtenstein and Norway. Some of the third parties that we share personal data with may need to transfer personal data outside of the EEA, for example to the United States of America.

Where your personal data is transferred to a country outside of the EEA and that country is not subject to an EU adequacy decision, we will ensure your data is protected by appropriate safeguards (for example, EU approved standard contractual clauses, a Privacy Shield certification, or a

supplier's Binding Corporate Rules). A copy of the relevant safeguard can be provided for your review on request.

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### **How long JNI retains personal data**

We retain personal data relating to your purchases for several years from the date of the relevant transaction. This is to understand your purchasing preferences and to meet our legal and contractual obligations.

Where you have asked us not to send you direct marketing, we keep a record of that fact to ensure we respect your request in future.

We also retain information with the potential to give rise to legal disputes for 7 years.

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### **Your rights to withdraw consent and to object (including to direct marketing)**

Wherever we rely on your consent to process personal data, you always have a **right to withdraw** that consent.

You also have the **right to object** to any use of your personal data for direct marketing purposes, as well as to processing that we undertake based on our legitimate interests.

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### **Your other personal data rights**

In addition to your rights to withdraw your consent and to object, you have the right to ask us:

- for **access** to information about your personal data or for a copy of your personal data

- to **correct** or **delete** your personal data
- to **restrict** (i.e. stop any active) processing of your personal data
- to provide you with certain personal data in a **structured, machine readable format** and to transmit that data to another organisation

These **rights may not always apply**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have a compelling legitimate interest in keeping. If this is the case then we'll let you know when we respond to your request.

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### **How to contact us and exercise your rights**

The easiest way to stop receiving information from us is by opting out of communications through your online preference centre (this is linked to in our communications with you and is accessible at times via your account settings). You can also correct your registration details through your online account.

We will do our best to assist with any queries you have about your personal data. You can contact our Data Protection Officer at any time by emailing [admin@nadel.uk.com](mailto:admin@nadel.uk.com) with "Attention: Data Protection Officer" in the subject line. When you do so, please provide your full name, your preferred contact information, and a summary of your query.

If you have unresolved concerns, you also have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK.

***Last updated 16 May 2018***

We suggest that you check back here for updates, as we will update this policy from time to time.

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