

## BOOFLE PRIVACY POLICY

We understand the importance of ensuring that we treat your personal data carefully and in confidence. We respect your privacy and are committed to protecting your personal information.

This Privacy Policy tells you about how and why we collect and use the personal data which you provide to us or which we collect about you when you interact with us, when you use our website or apps, connect with us via social media, or link to or from our website/apps. It also tells you about your privacy rights and how the law protects you. It has been updated to reflect the new and additional rules that apply under the General Data Protection Regulation ("GDPR").

We want you to be fully informed about how we use your data, how we keep it secure and your rights.

We trust this Privacy Policy will answer any questions you have, but if not, please do get in touch with us directly at [GDPR.Enquiry@ukgreetings.co.uk](mailto:GDPR.Enquiry@ukgreetings.co.uk). It is important that you read this privacy notice together with any other privacy notice we may provide when we are collecting or processing personal data about you, so you are fully aware of how and why we are using your data. It should also be read along with our Terms and Conditions of Use and our Cookies Policy which can be found on [www.boofle.co.uk](http://www.boofle.co.uk).

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We will need to update this Privacy Policy from time to time by updating this page. We will notify you of any significant changes, but would encourage you to come back and review it

from time to time. If the details you have provided to us change, please let us know, so we can make sure our records are accurate and up to date.

## **1 IMPORTANT INFORMATION AND WHO WE ARE**

Boofle is a trademark of UK Greetings Limited ("UK Greetings", "we", "us"), whose head office is at Mill Street East, Dewsbury, West Yorkshire, WF12 9AW. This Privacy Policy is provided by UK Greetings. We are the data controller of any personal data we collect about you, and we are responsible for the Boofle website ([www.boofle.co.uk](http://www.boofle.co.uk)).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [Contact us](#) in the first instance, using our contact details at the end of this privacy policy.

## **2 THIRD PARTY LINKS**

Our website includes links to other organisations' websites, plug ins and applications. For example, when you click to buy Boofle cards and gifts, this takes you to the Clintons website, if you click to download one of the Boofle apps, this takes you to the Apple/iTunes online store, and there are also links to Facebook and Twitter. When you click to view one of Boofle's videos, this takes you to the YouTube channel. Clicking on those links or enabling those connections may allow them to collect or share information about you.

These companies are also data controllers, and have their own privacy statements, telling you what they do with your data. We do not control these companies, or have any responsibility for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **3 USING YOUR DATA LAWFULLY**

We will only use your personal data when we have a lawful basis to use it. We will usually only use it to provide this website and the features and functionality it offers, in a way that you might reasonably expect as part of running our business. We have a legitimate interest in promoting the Boofle brand. In all our uses of your data, we always consider your privacy rights, and aim to ensure that these are protected.

For some uses, we will ask for your consent, such as to receive our email newsletter, or to show any photos you upload on our photo gallery.

We sometimes need to use data to comply with our legal obligations.

Further details of how we will use your personal information are provided below.

## **4 WHAT INFORMATION WE COLLECT FROM YOU AND HOW WE USE IT**

The information we collect about you and how we will use it, depends on how you interact with us, for example, if you contact us with a query by email, or sign up for our newsletter. The table below provides some examples of the information we collect about you, how we will use it, and our legal basis for processing.

<b>The personal data we collect from/about you</b>	<b>How we use it</b>	<b>Lawful Basis</b>
<p>We will collect the personal data we need to identify you, such as your name. We will also collect your contact details, such as your email address, and, where we need it, your postal address.</p>	<p>To send you email newsletters to keep you up-to-date about our products and services which we think will interest you and our latest offers.</p> <p>So that you can enter competitions, events or prize draws run by us.</p> <p>To allow you to complete any surveys we send you (if you wish to) or to comment on or review our products, to help us to improve them.</p> <p>Fraud prevention and detection</p>	<p>Where you consent.</p> <p>Our legitimate interest in promoting the Boofle brand and running our business</p> <p>Legal obligation/our legitimate interest in protecting our business</p>
<p>Information you provide to us when you contact us by email, by post [or on social media].</p>	<p>Provide you with the support and customer service you have requested.</p>	<p>Our legitimate interest in promoting the Boofle brand and running our business</p>
		<p>Our legitimate interest in providing a good service and managing our business</p>
<p>Technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Full details as to how we process and use cookies can be found on our Cookies Policy</p>	<p>To administer and to improve our Website, to ensure it is presented in the most effective manner for you and to give you the best Website experience and to allow you to participate in interactive features of our Website if you choose to do so.</p> <p>For data analysis, testing, research and statistical statistics to help us to improve our products and services.</p>	<p>Our legitimate interest in promoting the Boofle brand and running our business</p>

	To keep our Website safe and secure.	
Additional information you choose to provide when making use of the features of our website, like posting a comment.	To provide the website features	Your consent

Normally, we will not collect "special categories" of sensitive data, for example, health or racial or ethnic origin. If we ever do, we will make sure we have your consent or another lawful basis to process it.

Where we are relying on your consent as a lawful basis for our processing, you have the right to withdraw that consent at any time. Further details are set out in section 10.

Where we are required to collect or process personal data by law, or in order to fulfil a request you make, and you do not provide that data, we may not be able to do what you ask us to do. If this is ever the case, we will flag it to you.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data, but does not directly or indirectly reveal your identity. For example, we may aggregate website users' data to calculate the percentage of users accessing a particular feature. [If we ever combine that data with other data so we can identify you, we treat it in accordance with this Privacy Policy.

## 5 SHARING YOUR DATA

### Sharing your data within the American Greetings Group

We may share your personal data with other companies within the American Greetings Group to enable us to run data analysis, develop new products, for other business development purposes and/or to allow them perform services on our behalf. Where we do this, we have written contracts in place between the companies within the American Greetings Group to ensure your privacy is secure and respected.

### Sharing your data with trusted third parties

We share your personal data with trusted third parties to allow us to provide our services to you. When we do share your data with these third parties we only provide the information they need to perform the service. We have written contracts in place with them to ensure they only use your data for the purpose we specify to them and that your privacy is secure and respected.

These trusted third parties include the following:

- Professional service providers such as website hosting providers, system providers, website analytics providers, who help us run our business;

- Direct marketing companies who help us manage our electronic communications with you;
- Professional advisers, including lawyers, auditors etc.

We may also share your personal data in connection with a business transition (such as a merger, acquisition by another company, or a sale of all of or portion of our assets). In these circumstances, we may need to share your personal data with a prospective buyer and external professional advisers such as accountants, insurers, lawyers or financial institutions.

We may be required to share your personal data with the police, administrative authorities (such as HMRC) or other enforcement, regulatory or Government bodies, where we are legally obliged to do so.

We will only share your personal data with third parties (including our group companies) for them to use for their own direct marketing purposes when you have given your consent for us to do so.

## **6 INFORMATION WE RECEIVE FROM THIRD PARTIES**

We may receive information about you from third parties, such as partners we run competitions with], or from other organisations we work with, or from publicly available sources, such as Companies House, or information which is published in the media.

Depending on your settings or the privacy policies of social media or messaging services, such as Facebook, Twitter or WhatsApp, we may collect information about you from these sources, with your permission.

We may combine the information you have given us, with information obtained from other sources, but we will only do this when we have a lawful basis to do so.

## **7 INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA**

We are part of a global business, the American Greetings Group, and some of our group companies and service providers are located in countries outside of the EU, such as the USA, or perform some or all of their services from outside the EEA.

As a result, some personal data that we collect from you may be transferred to or accessed from outside the EU.

If we do this, we have procedures in place to ensure your data receives the necessary protections. Any transfer of your personal data will follow applicable laws and we will treat the information according to the principles set out in this Privacy Policy. We will always look to ensure that one of the means of ensuring the protection of your data outside the EEA approved by the EU is in place. For example, we have standard contractual clauses approved by the European Commission ("EC") in place with our parent company, American Greetings Corporation. Other means of protection include transfers to countries approved by the EC, or transfers to companies in the USA who have self-certified to the Privacy Shield framework.

If you would like further information, please contact us using the details provided at the end of this Privacy Policy.

## 8 HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will only keep your personal data for as long as we need to for the reason we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data. For more information, see section 13, Your Legal Rights, below.

When we are no longer required to keep your personal data, your data will either be deleted or completely anonymised. For example, by aggregation with other data so that it can be used in a non-identifiable way for business planning and analysis purposes.

## 9 SECURITY

We are committed to ensuring that your personal data is secure and we have put in place suitable physical, electronic, contractual and managerial procedures, including our Information Security Management System, to protect your personal data. Our employees who have access to and process your personal data are obliged to respect the confidentiality and security of your personal data.

## 10 HOW CAN I WITHDRAW CONSENT TO MARKETING COMMUNICATIONS?

We love keeping you up-to-date by email about our latest products, services, offers and competitions, but if you decide that you don't want to receive these communications at any point, you can unsubscribe by post or email at the contact details at section 15, or by clicking "unsubscribe" on any newsletter or other communication we will send you.

## 11 COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please visit [www.boofle.co.uk/cookie-policy/](http://www.boofle.co.uk/cookie-policy/).

## 12 CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#) using our contact details at the end of this privacy policy.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 13 YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data. To find out more about these rights please see the text below:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. If we are not able to comply with your request for erasure for specific legal reasons, we will tell you at the time of your request.
- **Object to processing** of your personal data where we are relying on our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 14 CHILDREN

Customers must be over 13 to sign up for our newsletter. We will not knowingly collect data about under 13s and if you are under 13, please do not provide us with your personal

information. We would ask parents to please ensure that their children that are under 13 do not provide us with any personal information without their permission. If you believe that a child who is under 13 has provided personal data to us, please contact us, using the details below and we will seek to delete that data from our systems.

### **Photographs/interacting with the site**

Whilst we love our customers to share with us Boofle related photos to go into our website photo gallery, we do not want you to harm your or anyone else's privacy. If ever your photos contain pictures of people, please ensure that you have the agreement of everyone in the photo to posting it on our photo gallery. If there is a child under 13 in the picture, you must have the consent of the child and their parent or guardian. Please also look at our Terms and Conditions for rules about photos, which can be found on [www.boofle.co.uk](http://www.boofle.co.uk)

To further protection your personal data, when posting comments that will be visible on any part of the site, we recommend that you use a handle other than your real full name.

## **15 CONTACTING US**

If you have any queries, comments or requests about this Privacy Policy, you have a complaint or you would like to exercise any of your rights set out above, you can contact us in the following ways:

- by email at [GDPR.Enquiry@ukgreetings.co.uk](mailto:GDPR.Enquiry@ukgreetings.co.uk) or
- by post to UK Greetings Limited, Mill Street East, Dewsbury, West Yorkshire, WF12 9AW.