

## Sparkle Town Privacy Policy

### Privacy and Cookies Policy General Information

1  
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#### **Privacy and Cookies Policy**

##### **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; this policy sets out how we will treat your personal information.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website uses cookies. By using our website, you consent to our use of cookies in accordance with the terms of this policy.

##### **2. How we use your personal data**

- 2.1 In this Section 58 we have set out:
- (a) the general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is our website. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 2.4 We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include your name, address, telephone number and email address. The source of the service data is our website. The service data may be processed for the purposes of providing our goods and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 2.5 We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 2.6 We may process information contained in any enquiry you submit to us regarding goods and/or services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 2.7 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details and the transaction amount. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 2.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 2.9 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.10 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.11 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or

obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

- 2.12 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.13 Please do not supply any other person's personal data to us, unless we prompt you to do so.

##### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to any member of our group of companies (Sparkle Town Ltd) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 We may disclose your name, address, telephone number and email address to our suppliers or subcontractors, including but not limited to: Royal Mail, DHL, DPD, Parcel 2 Go and My Hermes, and insofar as reasonably necessary for delivery of your items.
- 3.4 We may disclose your email address and name to our suppliers or subcontractors, including but not limited to: Mail Chimp insofar as reasonably necessary for delivery of marketing emails, if you have opted to receive these.
- 3.5 Financial transactions relating to our website and services are handled by our payment services providers, including but not limited to Stripe, Etsy, Ebay and PayPal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices on their websites.
- 3.6 We will not disclose any of your data to any third parties for marketing purposes.
- 3.7 Should we sell or merge Sparkle Town, we may disclose your information as part of that transaction, only to the extent permitted by law.

3.8 In addition to the specific disclosures of personal data set out in this Section 59, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### 4. International transfers of your personal data

4.1 In this Section 60, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

4.2 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

4.3 Aside from the situations set out in section 60.2, we will not transfer your personal data to countries outside the European Economic Area (EEA).

#### 5. Retaining and deleting personal data

5.1 This Section 61 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 Notwithstanding the other provisions of this Section 62, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); or
- (d) in order to protect your vital interests or the vital interests of another natural person.

#### 6. Security of personal data

6.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

6.2 We will store all your personal data on personal computers and mobile devices.

6.3 All electronic financial transactions entered into through our website will be protected by encryption technology.

6.4 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

6.5 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

#### 7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

#### 8. Your rights

8.1 In this Section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can request [our personal data by emailing [info@sparkletown.co.uk](mailto:info@sparkletown.co.uk).

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you

withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.9 To the extent that the legal basis for our processing of your personal data is that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. You have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.12 You may exercise any of your rights in relation to your personal data by written notice to us.

## 9. Third party websites

9.1 Our website may include hyperlinks to, and details of, third party websites.

9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 10. Personal data of children

10.1 Our website and services are targeted at persons over the age of 18.

10.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

## 11. Updating information

11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 12. About cookies

12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

12.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

12.4 Cookies can be used by web servers to identity and track users as they navigate different pages on a website and identify users returning to a website.

## 13. Cookies that we use

13.1 We may use both session and persistent cookies on our website.

13.2 We may use cookies for some or all of the following purposes:

(a) authentication - we may use cookies to identify you when you visit our website and as you navigate our website;

(b) status - we may use cookies to help us to determine if you are logged into our website;

(c) shopping cart - we may use cookies to maintain the state of your shopping cart as you navigate our website;

(d) personalisation - we may use cookies to store information about your preferences and to personalise our website;

(e) security - we may use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(f) advertising - we may use cookies to help us to display advertisements that will be relevant to you; and

(g) analysis - we may use cookies to help us to analyse the use and performance of our website and services.

## 14. Cookies used by our service providers

14.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

14.2 We use Google Analytics and Shopify to analyse the use of our website. They gather information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## 15. Managing cookies

15.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

15.2 Blocking all cookies will have a negative impact upon the usability of many websites.

15.3 If you block cookies, you will not be able to use all the features on our website, including the shopping cart.

## 16. Cookie preferences

16.1 You can manage your preferences relating to the use of cookies on our website via your web browser.

## General Information

### 17. Variation

17.1 We may amend these policies at any time by publishing a new version on our website.

### 18. Our details

18.1 Sparkle Town is wholly owned and operated by Sparkle Town Limited.

18.2 This website is owned and operated by Sparkle Town Limited.

18.3 Sparkle Town Limited is registered in England and Wales under registration number 12700024.

18.4 Our registered address is Sparkle Town Limited, Eastway Enterprise Centre, 7 Paynes Park, Hitchin, SG5 1EH.

18.5 You can contact us by writing to the business address given above, by using our website contact form, by email to [info@sparkletown.co.uk](mailto:info@sparkletown.co.uk) or by telephone on 01462372040. We prefer to be contacted by email wherever possible.

### 19. Credit

19.1 Credit and thanks to SEQ Legal for their assistance in creating these Terms and Conditions. [www.seqlegal.com](http://www.seqlegal.com).