

Privacy Policy

Welcome to the Brand Addition Privacy Policy

Brand Addition Limited and its group companies respect your privacy and are committed to protecting your personal data.

This privacy policy explains how we look after your personal data when you visit any website hosted and maintained by Brand Addition (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of our site, including any data you may provide through our site when you sign up for our newsletter, purchase a product or register an account with us.

Our site is not intended for children and we do not knowingly collect data relating to children.

It is essential that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

We are made up of different legal entities, including Brand Addition Limited, which is incorporated and registered in England.

This privacy policy is issued on behalf of the Brand Addition group of companies, so when we mention Brand Addition, “we”, “us”, or “our” in this privacy policy, we are referring to the relevant company in the Brand Addition group of companies that is responsible for processing your data.

Contact details

Our data privacy officer (DPO) is responsible for overseeing questions about this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details below.

Full name of legal entity: Brand Addition Limited

Email address: dataprotection@brandaddition.com

Registered office address: Broadway, Trafford Wharf Road,
Manchester, M17 1DD

Should you have any concerns, we would appreciate the chance to deal with them in the first instance. If you would like to speak to us about any concerns you have, please get in touch with us by email at dataprotection@brandaddition.com

You have the right to make a complaint to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

[Our ICO Registration Number is Z1651212.](#)

Changes to policy

We may amend and update this policy from time to time.

Any changes in the future will be posted on this page.

The date of the latest update to this privacy policy is set out at the bottom of this policy.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect 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 may collect, use, store and transfer different kinds of personal data that you give us through our site or by using our applications, corresponding with us by phone, e-mail or otherwise about you, which we have grouped as follows:

- **Identity Data** includes first name, middle name, maiden name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and

platform and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, purchases or orders made by you.
- **Usage Data** includes information about how you use our site and products and services.
- **Marketing and Communications Data** includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

Please keep us informed if your personal data changes during your relationship with us. We 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 is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods). In this case, we may be unable to process an order for a

product or we may need to cancel a product you have ordered with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

- Direct interactions. You may give us, or a company in the Brand Addition, your Identity, Contact and Financial Data by filling in forms or corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you;
- Place an order for our products;
- Create an account on our website;
- Subscribe to our newsletters;
- Request marketing to be sent to you; or
- Give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see below for further details on cookies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
- Technical Data from the following parties:
 - i. Analytics providers such as Google based outside the UK and/or EEA; and
 - ii. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the UK and/or EEA.
 - iii. Identity and Contact Data from data brokers or aggregators.

- iv. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK and/or EEA.

4. How we use your personal data

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

- Where you have consented to this;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation; and
- To the purchaser (or prospective purchaser) of any business or asset we are (or are contemplating) selling.

Please see the paragraph and table below for the specific purpose for which we use your data.

Purposes for which we will use your personal data

In a table format, we have set out below a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified our legitimate interests where appropriate (please see paragraph 12 (Glossary) for a definition of legitimate interest).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we rely on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you (please see paragraph 12 (Glossary) for a definition of performance of a contract)
To process and deliver your order, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review, feedback or take a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

		customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation (please see paragraph 12 (Glossary) for a definition of comply with a legal or regulatory obligation)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our

we serve to you		business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To market and promote our business, products, services and/or to inform you of our offers and promotions.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications Data	Please see the 'Direct Marketing' section below.

We may wish to contact you individually using your Identity and Contact data to market and promote our business, products, and services and/or to inform you of our offers and promotions. We refer to this as 'direct marketing'.

Direct marketing is typically sent by e-mail, although it may occasionally be sent via other communication channels.

If you act as a private consumer, we (the Brand Addition group of companies) will only send you direct marketing communications if you consented.

If you are acting as a business customer, we will only send you direct marketing communications if we have legitimate interests in doing so or if you have consented.

We will ensure that the way we obtain your consent to receive direct marketing is valid under applicable law. How we obtain your consent may depend on your location and whether you are acting as a private consumer.

In most circumstances, if you act as a consumer, applicable law requires us to obtain your 'opt-in' consent to receive direct marketing. However, in some circumstances, applicable law may allow us to obtain your consent on an 'opt-out' basis validly.

We will always obtain opt-in consent before we share your personal data with any company outside the Brand Addition group of companies for direct marketing purposes.

You will always have the right to withdraw your consent (opt-out) to receive direct marketing at any time by contacting us.

5. 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 malfunction.

About cookies

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

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.

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

Web servers can use cookies to identify and track users as they navigate different pages on a website and identify users returning to a website.

Our cookies

We use both session and persistent cookies on our website.

We use cookies on our website to recognise a computer when a user visits the website/track users as they navigate the website / enable the use of a shopping cart on the website / improve the website’s usability / analyse the use of the website / administer the website / prevent fraud and improve the security of the website / personalise the website for each user/target advertisements which may be of particular interest to specific users.

The names of the cookies we use on our website, and the purposes for which they are used, can be viewed by clicking on the ‘Cookie Script’ icon on our site and navigating to the ‘Cookie Declaration’ tab.

Analytics cookies

We use Google Analytics to analyse the use of our website.

Our analytics service provider generates statistical and other information about website use using cookies.

The information generated relating to our website is used to create reports about the use of our website. Our analytics service provider's privacy policy is available at: <http://www.google.com/policies/privacy/>.

Third-party cookies

Our website also uses third-party cookies.

We publish Google AdSense interest-based advertisements on our website. Google tailors these to reflect your interests. To determine your interests, Google will track your behaviour on our website and other websites using the DoubleClick cookie.

We publish Google AdSense advertisements on our website. To determine your interests, Google will track your behaviour on our website and other websites using the DoubleClick cookie.

This behaviour tracking allows Google to tailor the advertisements you see on other websites to reflect your interests (we do not publish interest-based advertisements on this website). You can view, delete or add interest categories associated with your browser by visiting: <http://www.google.com/settings/ads/>.

You can also opt out of the AdSense partner network cookie using those settings or using the NAI's (Network Advertising Initiative's) multi-cookie opt-out mechanism at: <http://www.networkadvertising.org/choices/>.

However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google

browser plug-in available
at: <https://www.google.com/settings/ads/plugin>.

Blocking cookies

Most browsers allow you to refuse to accept cookies.

The process to enable blocking will vary dependent on the internet browser application that you use. Please refer to the 'help' or 'support' function of your browser application for information about how to remove cookies stored by that application.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

Deleting cookies

You can delete cookies already stored on your computer.

The deletion process will vary dependent on the internet browser application(s) that you use. Please refer to the 'help' or 'support' function of your browser application for information about how to remove cookies stored by that application.

Deleting cookies will have a negative impact on the usability of many websites.

6. 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.

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.

7. Disclosures of your personal data

We may need to share your personal data with our employees and other legal entities within the Brand Addition group of companies for the purposes set out in the table in paragraph 4 above.

In addition to Brand Addition Limited, the Brand Addition group of companies currently also includes the following:

- Brand Addition Ireland Limited, whose registered office is at Unit G2 Calmount Business Park, Ballymount, Dublin 12, Ireland.
- Brand Addition GmbH, whose registered office is at Europastraße 19a, 45888 Gelsenkirchen, Germany.
- GatewayCDI, Inc. (doing business as 'Brand Addition) whose registered office is at 909 North 20th Street, St Louis, MO, 63106, United States of America.
- Brand Addition Asia Limited, whose registered office is at Room 1605/16F, Enterprise Square, Tower 3, 9 Sheung Yuet Road, Kowloon Bay, Kowloon, Hong Kong.
- Brand Addition Shanghai Limited, whose registered office is at Room 302, Qian Li Center (building T6), Baolong Plaza, No 6 311 Xinlong Road, Qibao Town, Minhang District, Shanghai, China.

We may also need to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- External third parties including:

- Specialist IT support, suppliers and sub-contractors for the performance of this site, our applications and any contract we enter into or you (such as Communigator, Qualtrics; PowerWeave, IDynamics, PosLogix, Ariba, Coupa, Tradeshift, Hubwoo, Adaptris and Communigator).
- Delivery companies to deliver your order (such as DHL, Royal Mail, Interlink).
- Payment processors we use to handle your payment for goods that you purchase (such as Adflex and PayPal).
- Suppliers of email marketing platform solutions (such as Spotler).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
- Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. International transfers

We share your personal data with other members of the Brand Addition group or external third parties referred to in paragraph 7 above, this may involve transferring your data outside the United Kingdom (UK) and/or European Economic Area (EEA).

In many instances, the countries to which we may transfer your personal data will have been approved by the European Commission and/or UK government (as applicable) as having adequate level of protection for personal data.

If that is not the case, we may instead use specific contracts approved by the European Commission or UK government (as applicable) which give personal data the equivalent protection to that which it has in Europe or the UK (as applicable).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and/or EEA.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, 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.

If you have registered to receive communications from us as part of our mailing list, then we will keep your personal data for up to 7 years, at which time we will seek to obtain consent from you to continue storing your data and contacting you.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Direct Marketing

We will inform you (before collecting your data) if we intend to use your data for direct marketing purposes. Unless you are acting as a business customer (in which case, we be entitled to rely on our legitimate interest to use your data for direct marketing purposes), we will only use your data for this if you have consented to this.

Correction of information

If you notify us that the personal data we hold is complete or inaccurate we will correct or complete the information as soon as possible.

Deletion of information

You have the right to request that your personal data be deleted; including if we no longer need it for the purpose we collected it, or, where our legal basis for processing is that you have given consent, you withdraw your consent.

Following such a request we will erase your personal data without undue delay unless continued retention is necessary and permitted by law.

Object to processing

You have the right to object to us processing your personal data 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 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.

Restriction on processing

You have the right to request that we suspend processing your personal data, but hold it for you, if the personal data we hold is inaccurate, the processing is unlawful or we no longer need the personal data. Once the processing is restricted, we will only continue to process your personal data if you consent or we have another legal basis for doing so.

Access to information

You have the right to access information held about you and any access request will usually be free of charge. We will endeavour to provide information in the format requested, but we may charge you a reasonable fee for additional (duplicate) copies.

Data Portability

You have the right to receive a copy of your personal data which you gave to us. The copy will be provided in a commonly used and machine-readable format. You can also have it transmitted directly from us to another data controller, where reasonably technically possible.

If you wish to exercise any of the rights set out above, please get in touch with us.

No fee is usually required

You will not need to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Withdraw consent at any time

You may withdraw your consent at any time when 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 be unable to provide you certain products or services. We will advise you if this is the case when you withdraw your consent.

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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone with no right to receive it. We may also contact you to ask you for further information about your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

12. Glossary

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Last Updated: 12/07/2013