

Privacy & Cookie policy

This website is operated by The Genie Way Limited.

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on:

- the personal information we collect about you
- what we do with your information, and
- who your information might be shared with.

Who we are

We are a 'data controller' for the purposes of the Data Protection Act 1998, (ie we are responsible for, and control the processing of, your personal information).

What information we collect?

Personal information provided by you

We collect personal information about you (such as your name, address, phone number, payment details) when you register with us or purchase products from us. We also collect personal information when you contact us, send us feedback, , compete customer surveys or participate in competitions.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and
- give consent to the processing of his/her information

Monitoring and recording communications

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention etc.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We use cookies and other similar tracking technologies on our website.

For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data etc. This information helps us to build a profile of our users. Some of

this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies, please see our Website cookie policy.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

How will we use the information about you?

We collect information about you so that we can:

- process your order;
- conduct research, statistical analysis and behavioural analysis;
- carry out customer profiling and analyse your purchasing preferences;
- if you agree, let you know about other products or services that may be of interest to you—see 'Marketing' section below;
- detect and prevent fraud;
- customise our website and its content to your particular preferences;
- notify you of any changes to our website or to our services that may affect you;
- improve our services; and

Marketing

We may from time to time like to send you information by post, email, telephone, text message (SMS) or automated call about our products and services, competitions and special offers which may be of interest to you.

We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes when you eg complete our online order form for the first time.

If you have consented to such receive marketing from us, you can opt out at any time. See 'What rights do you have?' below for further information.

Who your information might be shared with

We may disclose your personal data to:

- other companies within our group;
- our agents and service providers;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- our business partners in accordance with the 'Marketing and opting out' section above; and

Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- we store your personal data on secure servers; and

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

What can I do to keep my information safe?

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Transfers of your information out of the EEA

We may need to transfer your personal data outside the European Economic Area. Any transfer of your data will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

What rights do you have?

Right to request a copy of your information

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or it, please:

- email, call or write to us (see 'How can you contact us?' below)
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information you want a copy of, including any account or reference numbers, if you have them

Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below)
- let us have enough information to identify you (eg account number, user name, registration details), and
- let us know the information that is incorrect and what it should be replaced with

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below).
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone)

How to contact us

Please contact if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to hello@thegenieway.com

Changes to the privacy policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

Do you need extra help

If you would like this policy in another format (for example: audio, large print, braille) please contact us (see 'How can you contact us?' above.).

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;

- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) 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 but is not limited to: 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 and heat map 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 you. The account data may be processed for the purposes of operating our website, providing our services (including providing you with results), 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 consent and our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.4 We may process your information included in your personal profile on our website ("profile data"). The profile data may include but is not limited to: your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details and other lifestyle related data. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.5 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, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details and other lifestyle related data. The source of the service data is you. The service 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 consent and our legitimate interests, namely the proper administration of our website and business and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- 2.6 We may process information contained in any enquiry you submit to us regarding products and/or services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 2.8 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 but is not limited to: your contact details, your card details and the transaction details. 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 the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- 2.9 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.
- 2.10 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.
- 2.11 We may process any of your personal data identified in the other provisions of 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.
- 2.12 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.

3. Providing your personal data to others

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes 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 and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.3 We may disclose your personal data to our suppliers or subcontractors insofar as reasonably necessary for performance of the contract between you and us.
- 3.4 Financial transactions relating to our website and services may be handled by our payment services providers. 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.
- 3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may also 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.

4. Retaining and deleting personal data

- 4.1 This Section 4 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.
- 4.2 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.
- 4.3 We will retain and delete your personal data for a maximum of 12 months after which it is deleted
- 4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention 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.

5. **Amendments**

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

- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy by email

6. Your rights

- 6.1 In this Section 6, 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.
- 6.2 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.
- 6.3 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
- 6.4 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.
- 6.5 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; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those 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

- 6.6 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.
- 6.7 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.
- 6.8 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.
- 6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 6.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, 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.
- 6.11 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.

- 6.12 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.
- 6.13 You may exercise any of your rights in relation to your personal data [by written notice to us.

7. About cookies

- 7.1 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.
- 7.2 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.
- 7.3 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.

8. Cookies that we use

- 8.1 We use cookies for the following purposes:
- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website
 - (b) security - we use cookies as an element of the security measures used to protect user accounts, , and to protect our website and services generally
 - (c) analysis - we use cookies to help us to analyse the use and performance of our website and services

9. Cookies used by our service providers

- 9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers 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.

10. Managing cookies

10.1 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).

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

10.3 If you block cookies, you will not be able to use all the features on our website.

11. Our details

11.1 This website is owned and operated by The Genie Way Limited

11.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.