









# **Privacy & Cookie Policy**

### Welcome to the Dowlis Inspired Branding privacy notice

Dowlis Inspired Branding respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit any website, hosted and maintained by Dowlis Inspired Branding (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### 1. Important information and who we are

# Purpose of this privacy notice

This privacy notice 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 to 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 important that you read this privacy notice together with any other privacy notice 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 notice supplements the other notices and is not intended to override them.

### Controller

Dowlis Inspired Branding is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We are made up of different legal entities including Dowlis Inspired Branding Ltd and Dowlis Inspired Branding inc which are incorporated and registered in the UK and USA. This privacy notice is is sued on behalf of the Dowlis Global Limited so when we mention Dowlis Inspired Branding, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Dowlis Global Limited responsible for processing your data.

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

#### **Contact details**

Full name of legal entity: Dowlis Global Limited Email address: dataprotection@dowlis.com Postal address: Unit 2, 8 Forsyth Road, Woking, Surrey GU21 5SB [UNITED KINGDOM] 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 in relation to any concerns you have, please contact us by email at dataprotection@dowlis.com. 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).











### 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 in the footer 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 data about you. 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 notice 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 together 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, your 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 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 notice.

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 have 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 Dowlis Group Limited, your Identity, Contact and Financial Data by filling in forms or by 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 EU; and
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

### 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 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 that we are (or are contemplating) selling.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in Reviewed and Updated: May 2019 Next Review due: May 2021











relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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

We have set out below, in a table format, 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 what our legitimate interests are where appropriate (please see paragraph 10 (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 are relying 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 10 (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
- (c) Identity
- (d) Contact
- (e) Financial
- (f) Transaction
- (g) Marketing and Communications
- (h) Performance of a contract with you
- (i) 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
- (d) Marketing and Communications
- (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 Reviewed and Updated: May 2019 Next Review due: May 2021











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
- (d) 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)
- (e) Necessary to comply with a legal obligation (please see paragraph 10 (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 we serve to you

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications
- (f) Technical

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, 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 and to inform our marketing strategy)

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)

#### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.











#### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods from us and, in each case, you have not opted out of receiving that marketing.

# **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the Dowlis Group Limited of companies for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, warranty registration, product experience or other transactions.

#### 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.

#### **About cookies**

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.

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 that we store about you may be linked to the information stored in and obtained from cookies.

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.

#### **Our cookies**

We use both session and persistent cookies on our website.

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below.











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.

#### **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 by means of cookies.

The analytics cookies used by our website have the following names: \_utma, \_utmb, \_utmc and \_utmz. 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. These are tailored by Google to reflect your interests. To determine your interests, Google will trackyour behaviour on our website and on other websites across the web 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 on other websites across the web 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; for example:

• In Internet Explorer (version 10) you can block cookies using the cookie handling override settings Reviewed and Updated: May 2019 Next Review due: May 2021











available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";

- In Firefox (version 24) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- In Chrome (version 29), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

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; for example:

- In Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at http://support.microsoft.com/kb/278835);
- In Firefox (version 24), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history", clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- In Chrome (version 29), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Delete cookies and other site and plug-in data" before clicking "Clear browsing data".

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

#### 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.

# 5. Disclosures of your personal data

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

• Internal third parties such as our employees or officers and legal entities within the Dowlis Group Limited companies. External third parties including specialist IT support, suppliers and subcontractors for the performance of this site, our applications and any contract we enter into with them or you including Communigator, Qualtrics, delivery companies to deliver your order (such as DHL, Royal Mail, Interlink), Authorize.net, Paymentsense card payment solutions, PayPal,











PowerWeave, IDynamics, PosLogix, Ariba, Coupa, Tradeshift, Hubwoo, Adaptris, Communigator.

• 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 notice.

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.

#### 6. International transfers

We share your personal data with other members of the Dowlis Group Limited and between countries in which we operate. This will involve transferring your data outside the European Economic Area (EEA) as per Dowlis Inspired Branding's Data Protection Policy.

Many countries to which we may transfer your personal data outside of the EEA do not have an adequate level of protection for personal data approved by the European Commission. However, where we use certain service providers (as per paragraph 5), we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

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

#### **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.

#### 8. 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 Reviewed and Updated: May 2019 Next Review due: May 2021











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 10 years, at which time we will seek to obtain consent from you to continue storing your data and contacting you.

#### 9. Your legal rights

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

#### Marketing

We will inform you (before collecting your data) if we intend to use your data for marketing purposes. We will only use your data for this if you have not opted out.

#### 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. If we made the personal data public, we will take reasonable steps to inform other data controllers processing about your erasure request.

#### 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, in the event 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 a 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 Contact us.

# No fee usually required

You will not have 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 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.

### 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 any person who has no right to receive it. We may also contact you to ask you for further information in relation to 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 a number of requests. In this case, we will notify you and keep you updated.

# 10. Glossary

#### Lawful basis

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.











**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.