

# Choix Limited – Customer Privacy Policy

## 1. Introduction

- 1.1 We are **Choix Group Ltd** (referred to as **Choix, we, us** and **our** in this Privacy Policy), a company incorporated in England with company registration number 11595086 and whose registered office address is Wey Court West, Union Road, Farnham, Surrey, United Kingdom, GU9 7PT.
- 1.2 The information set out in this Privacy Policy is provided to individuals whose personal data we process (**you** or **your**) as data controller, in compliance with our obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (**UK GDPR**).
- 1.3 It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy 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 other notices and privacy policies and is not intended to override them.

## 2. Data controller details

- 2.1 We are the data controller in relation to the processing of the personal information that you provide to us. Our contact details are as follows:
  - 2.1.1 Address: Wey Court West, Union Road, Farnham, Surrey, United Kingdom, GU9 7PT.
  - 2.1.2 Email address: [rollo@mychoix.com](mailto:rollo@mychoix.com). please include “Personal Data Request” in your subject heading to ensure it receives the correct attention).

## 3. How we collect your information

- 3.1 Generally, the information we hold about you comes from the way you engage with us through your use of our website and platform.
- 3.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 4. What we collect

- 4.1 The types of personal data that we may collect, use, store and transfer about you are as follows:
  - 4.1.1 **Contact data:** details of how to contact you including your title, name, address, email address, telephone numbers.
  - 4.1.2 **Profile data:** details of your username or similar identifier, password, age, date of birth, gender, interests, statistics, preferences, feedback and survey responses;
  - 4.1.3 **Financial data:** details of your bank account and payment card details;
  - 4.1.4 **Usage data:** information about your use and interactions with our website including, but not limited to, traffic data and other communication data.;
  - 4.1.5 **Location data:** details such as a country identifier and time zone; and
  - 4.1.6 **Other/voluntary information:** any other information which you share with us when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of our platform.
- 4.2 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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.

- 4.3 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.

## 5. Purpose/Legal grounds

What do we use your information for?	Type of data	Lawful basis for processing including basis of legitimate interest
<ul style="list-style-type: none"> <li>Handling your enquiries</li> </ul>	<ul style="list-style-type: none"> <li>Contact data</li> <li>Other voluntary information</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (in order to respond to your enquiry effectively)</li> </ul>
<ul style="list-style-type: none"> <li>To resolve any issues you identify with our platform</li> </ul>	<ul style="list-style-type: none"> <li>Contact data</li> <li>Profile data</li> <li>Usage data</li> <li>Location data</li> <li>Other voluntary information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary for our legitimate interests (tracking the fault and ensuring that it has been managed in a way that is appropriate to the fault found)</li> </ul>
<ul style="list-style-type: none"> <li>To administer and protect our business, website and platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> </ul>	<ul style="list-style-type: none"> <li>Contact data</li> <li>Profile data</li> </ul>	<ul style="list-style-type: none"> <li>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)</li> </ul>
<ul style="list-style-type: none"> <li>To use data analytics to improve our website, products/services, customer relationships and experiences</li> </ul>	<ul style="list-style-type: none"> <li>Profile data</li> <li>Usage data</li> </ul>	<ul style="list-style-type: none"> <li>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)</li> </ul>
<ul style="list-style-type: none"> <li>To manage our relationship with you including informing you about changes to our terms or privacy policy</li> </ul>	<ul style="list-style-type: none"> <li>Contact data</li> <li>Other voluntary information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary to comply with a legal obligation</li> <li>Necessary for our legitimate interests (to keep our records updated)</li> </ul>

<ul style="list-style-type: none"> <li>• First-party cookies from our website are collected and shared with Facebook, Google and other social media third parties to deliver relevant adverts and services</li> </ul>	<ul style="list-style-type: none"> <li>• Usage data</li> <li>• Contact data</li> <li>• Technical data</li> <li>• Marketing and communications data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to provide you with more relevant content)</li> <li>• We will obtain your consent prior to sending any marketing communications to you (see further information below regarding how you can opt-out)</li> <li>• You are also required to provide your consent for us to collect cookies information about you. You can withdraw your consent at any time</li> </ul>
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## 6. Change of purpose

- 6.1 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.
- 6.2 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.
- 6.3 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. Sharing your information

- 7.1 Please note that personal information we are holding about you may be shared with and processed by:
- 7.1.1 regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
  - 7.1.2 credit reference and fraud prevention agencies;
  - 7.1.3 any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
  - 7.1.4 third party providers to carry out data analysis including number of visits to our website, when such visits are made, from which region and through which channel if not a direct visit;
  - 7.1.5 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;
  - 7.1.6 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
  - 7.1.7 our trusted, advertising and analytics to provide customised content and advertising and to analyse traffic to the site;
  - 7.1.8 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bank, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested; and

- 7.1.9 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

## **8. International transfers**

- 8.1 We may need to transfer personal data relating to you (including, without limitation, name, address, date of birth, and absence information and all information related to your compensation and taxation for this purpose) outside the United Kingdom (**UK**), including to our affiliated companies.
- 8.2 We will not transfer personal data relating to you to a country which is outside the UK unless one of the following scenarios under UK GDPR applies:
  - 8.2.1 the country or recipient is covered by an adequacy decision of the Commission under UK GDPR Article 45;
  - 8.2.2 appropriate safeguards have been put in place which meet the requirements of UK GDPR Article 46; or
  - 8.2.3 one of the derogations for specific situations under UK GDPR Article 49 is applicable to the transfer. These include (in summary):
    - 8.2.3.1 the transfer is necessary to perform, or to form, a contract to which Choix is a party:
      - 8.2.3.1.1 with you; or
      - 8.2.3.1.2 with a third party where the contract is in your interests;
    - 8.2.3.2 the transfer is necessary for the establishment, exercise or defence of legal claims;
    - 8.2.3.3 you have provided your explicit consent to the transfer; or
    - 8.2.3.4 the transfer is of a limited nature, and is necessary; or
  - 8.2.4 for the purpose of Choix's compelling legitimate interests.

## **9. Retention of personal data**

- 9.1 Unless we are required or permitted by law to hold on to your data for a specific retention period (for example, by rules imposed by the Data Retention and Investigatory Powers Act 2014) we will only hold your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, in particular:
  - 9.1.1 Contact data is retained for as long as you are an active user of our services and for 2 years after you delete your account;
  - 9.1.2 Payment data is retained for 6 years from the date of your last transaction with or through us; and
  - 9.1.3 Usage data is retained for as long as you are an active user of our services and for 2 years after you delete your account.
- 9.2 We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 9.3 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, regulatory, tax, accounting or other requirements.
- 9.4 Where we no longer need your personal information, we will dispose of it in a secure manner.

- 9.5 In some circumstances you can ask us to delete your data: see your legal rights at paragraph 10 below for further information.
- 9.6 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. Your rights in respect of your personal data

- 10.1 You have certain rights under existing data protection laws, including the right to (upon written request) access a copy of your personal data that we are processing. In accordance with the UK GDPR:
- 10.1.1 you will have the following rights:
- 10.1.1.1 **right to access:** the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one copy of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and
  - 10.1.1.2 **right to rectification:** the right to have your personal information rectified if it is inaccurate or incomplete; and
- 10.1.2 in certain circumstances, you will also have the following rights:
- 10.1.2.1 **right to erasure/“right to be forgotten”:** the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);
  - 10.1.2.2 **right to restriction of use of your information:** the right to stop us from using your personal information or limit the way in which we can use it;
  - 10.1.2.3 **right to data portability:** the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and
  - 10.1.2.4 **right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.
- 10.2 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.
- 10.3 We try to respond to all legitimate requests within one month. Occasionally it could 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.
- 10.4 You have the right to unsubscribe from our marketing communications at any time by following the link in the footer of the last email you received from us (“Unsubscribe”) or by sending your request with detailed instructions to us (see contact details above in the “Data Controller details” section).

- 10.5 Please note that, if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to carry out our contractual obligations to you or provide you with access to all or certain parts of our services.
- 10.6 If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office. Please see further information on their website: [www.ico.org.uk](http://www.ico.org.uk).

## 11. Automatic decision making

We do not make decisions based solely on automated data processing, including profiling.

## 12. 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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO COOKIE POLICY\]](#).

## 13. Security

13.1 We keep your information protected by taking appropriate technical and organisational measures to guard against unauthorised or unlawful processing, accidental loss, destruction or damage. For example:

13.1.1 where appropriate, data is encrypted when transiting on our system or stored on our databases;

13.1.2 we have implemented safeguards in relation to access and confidentiality in order to protect the information held within our systems; and

13.1.3 we frequently carry out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud.

13.2 However, while we will do our best to protect your personal information, we cannot guarantee the security of your information which is transmitted via an internet or similar connection. It is important that all details of any username, password and/or other identification information created to access our servers are kept confidential by you and should not be disclosed to or shared with anyone.

## 14. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website (the "last updated" reference tells you when we last updated our Privacy Policy).

Last updated \_\_\_\_\_