SPROGS TOGS PRIVACY POLICY

WHO ARE WE?

This website (www.sprogstogs.com) ("Site") is operated by Sprogs Togs UK Ltd, a company registered in England and Wales with company number 12278491 ("We" or "Us").

Sprogs Togs UK Limited is the data controller for the purposes of the Data Protection Act 1998

WHAT IS THIS PRIVACY POLICY IS FOR?

This Privacy Policy explains how We will process any personal data that We collect from you, or that you provide to Us.

When We refer to "personal data" in this Policy it means any information that relates to you from which you can be identified either directly or indirectly. By using our Site or submitting your personal data to Us via it, you will be deemed to have accepted the terms of this Policy, so please read it carefully.

WHAT PERSONAL DATA MAY WE COLLECT?

We may collect and process the following personal data about you:

Information you give Us. This is information you give Us about you for example when ordering an item from us, selling or buying from Us or when opening a customer account with us. It includes information you provide when you correspond with Us by phone or email [share data via our social media functions, enter a competition, promotion or survey, give us feedback or when you report a problem with the Site.] The information you give Us may include your name, address, email address and phone number, the phone number of the device with which you place an order, or your username.

• Information about your bank account that We require for the purpose of processing payments to you if you sell items to Us. For further details please also refer to the section below headed <u>PAYMENT INFORMATION</u>.

Information we collect about you. When you use the Site, we will automatically collect the following information:

- technical information, including the type of mobile, tablet or computer ('Device') you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, the mobile phone number used by the Device), your IP address, mobile network information, Internet Service Provider, your mobile operating system, the version and type of mobile browser/platform you use and your time zone setting; and
- details of your use of the Site such as page views, Site navigation, the length of your visit, referral source/exit pages and the resources that you access.

COOKIES

Our Site uses cookies to distinguish you from other users. This is to provide you with a good user experience when you browse our Site and allows Us to improve its features. For detailed information on the cookies we use, please see our <u>Cookie</u> <u>Policy</u>.

HOW WE USE YOUR DATA

We may use your personal data for the following purposes:

- to acknowledge, confirm or send receipts for any orders you make to buy or sell items through the Site;
- to deal with enquiries, complaints and feedback from you and our service providers;
- to process your payment if you sell items to Us;
- to manage, improve and administer our Site and to ensure that our Site is presented in the most effective manner for you;
- We may store and use your account details to pay you for items. You can opt-out of Us holding your account details at any time, although this will mean that you will need to re-supply Us with account details to initiate any future payments;
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site secure;
- to enforce or apply our <u>Terms of Selling</u> to Sprogs Togs UK Ltd, our <u>Returns and Refunds Policy</u> or to investigate potential breaches of them;
- to our data analysis service provider, Google Analytics. Google uses data collected from the Site to track and examine the use of the Site, to prepare reports on its activities and may share them with other Google services. Google may process data it collects from US in the U.S.A. If you

enable 'Do Not Track' in your web browser, the application of Google Analytics can be reduced;

- to notify you of changes to the Site or the services we provide through it; or
- if you have consented, to send you newsletters, surveys and other communications. If you complete a survey for Us we may process the information you choose to submit in response;

DISCLOSURE OF YOUR DATA

We may share your personal data with the following third parties:

- to selected third parties who act on our behalf to support our operations, for example our payment service providers, Royal Mail or other delivery services we may use to deliver your items, or our IT suppliers to provide Us and You with IT support;
- to an acquirer if We, or substantially all of our assets, are acquired;
- to a prospective seller or buyer if We sell or buy any assets;
- to law enforcement or regulatory agencies if We are under a legal or regulatory obligation to do so; and
- to other companies and organisations for the purposes of fraud protection and credit risk reduction, or to protect the rights, property, or safety of Sprogs Togs, Our users, suppliers, contractors or others.

PAYMENT AND FINANCIAL INFORMATION

If you purchase any items via the Site, we will not directly process or store the debit/credit card data that you submit to the Site to buy those items ourselves. Any such credit/debit card payments to buy items will be processed by our third party payment providers.

If you sell any items to Us, we will securely store your bank account details on our secure banking system.

WHERE WE STORE YOUR DATA

The information that We collect from you will be stored on servers located in the UK. However, it may be processed by staff operating outside the EEA who work for Us or for one of our suppliers. These staff may for example be engaged in the fulfilment of your request or the processing of your payment details or provide IT support services to Us.

Please note that the U.S.A and certain other countries outside the EEA do not provide the same legal standards for protection of your personal data that you have in the United Kingdom or EEA.

By submitting your personal data, you agree to the transfer and processing of your personal data outside the EEA for the purposes set out in this Privacy Policy. All information you provide to Us is stored on secure servers. Where We have given you (or where you have chosen) a password or log-in which enables you to access certain restricted parts of our Site, you are responsible for doing everything you reasonably can to keep these details secret. We must not to share your password or log-in details with anyone else.

Unfortunately, the transmission of information over the internet or public communications networks can never be completely secure. We will take appropriate technical and organisational security measures (such as encrypting any personal data you enter onto the site with Secured Sockets Layered technology) to protect the personal data that you submit to Us against unauthorised/unlawful access or loss, destruction or damage, however We cannot 100% guarantee the security of data that you provide to Us online.

MARKETING EMAILS

You have the right to ask Us not to process your personal data for marketing purposes. We will inform you before collecting your data if We intend to use your data for such purposes or if We intend to disclose your information to any third party for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise that right at any time by contacting us at <u>support@sprogstogs.com</u>

LINKS TO THIRD PARTY WEBSITES

The Site may, from time to time, contain links to and from third party websites. These websites and any services accessible through them will have their own privacy policies. We do not accept any responsibility or liability for the actions of those third parties, their policies or for any personal data that they may collect from you. Please check their privacy policies before you submit any personal data to any such websites or use such services.

YOUR DATA PROTECTION RIGHTS

Certain data protection laws (this will depend on which country you live in) give you a right to receive information about the personal data We hold about you. In the UK, the Data Protection Act 1998 gives you the right to access information held about you. Any access request may be subject to a fee of GBP £10 to meet our costs in responding to your request. We may also need to ask you for further information to verify your identity before We can respond to you. You can update, correct or delete the personal data we hold about you at any time by contacting us at <u>support@sprogstogs.com</u>

CHANGES TO OUR PRIVACY POLICY

Any changes We may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or modifications. If We make any material changes, We will notify you of them either by email or when you next visit the Site.

CONTACT

Questions, comments or requests regarding this Privacy Policy should be addressed to support@sprogstogs.com