

IMPORTANT PRIVACY POLICY – PLEASE READ CAREFULLY

Welcome to PMG Retail Ltd T/A PMG Schoolwear's [PMG] privacy notice update 24th May 2018 in line with GDPR Requirements.

PMG is committed to respecting the privacy rights of visitors to its website. and to protecting your personal data. This privacy policy explains how we collect, store and use personal data about you when you browse www.pmgschoolwear.co.uk (the "Website"), shop with us or otherwise provide your personal data to us. It provides you with details about the types of personal data that we collect from you, how we use your personal data and the rights you have to control our use of your personal data.

You must read this privacy policy carefully and we recommend that you print and retain a copy for your future reference. By accessing, browsing or otherwise using this Website, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree to this privacy policy in its entirety, you must not use this Website.

WHO WE ARE

PMG Retail Ltd is a company registered in England and Wales (registration number 05205232) whose registered office is at Unit 4 Swan Wharf Business Centre, Waterloo Road, Uxbridge, Middlesex, UB8 2RA. PMG Schoolwear is the trading name of PMG Retail Ltd (referred to as "PMG", "we" or "us" in this privacy policy).

We respect your right to privacy and will only process personal data you provide to us in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other applicable privacy laws.

If you have any questions about how we collect, store and use personal data, or if you have any other privacy-related questions, please contact us by any of the following means:

phone us on: 01895 809321;

• e-mail us at: customer.services@pmgretail.co.uk or

 write to us at: PMG Retail Ltd, Unit 4 Swan Wharf Business Centre, Waterloo Road, Uxbridge, Middlesex, UB8 2RA

CHILDREN

We do not and will not knowingly collect information from any unsupervised person under the age of 18. If you are under the age of 18, you must not use this Website or submit any personal data to us unless you have the consent of, and are supervised by, a parent or guardian.



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.

THE PERSONAL DATA WE COLLECT ABOUT YOU

When you make purchases from PMG (via the website or over the phone) we may collect the following personal data about you:

- your name, date of birth, age and sex;
- your billing and delivery postal addresses, phone, fax and e-mail details;
- where you have registered with us, your user name and password;
- your communication preferences;
- your browsing and online shopping activities

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.

FAILURE 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 or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



HOW WE STORE AND USE YOUR INFORMATION

PMG (and third party data processors acting on our behalf) may collect, store and process your personal data:

- to make this Website available to you and to provide you with content which is tailored to your individual tastes;
- to maintain any registered account that you hold with us
- with your agreement, to contact you (including by SMS and e-mail) about promotional offers and products and services which we think may interest you and for customer satisfaction and market research purposes. You have the right to withdraw consent to marketing at any time by *contacting us*.;
- to provide our goods and services to you and for associate purposes, including verifying your identity;
- for research, analysis, testing, monitoring, risk management and administrative purposes; and
- for any related purposes, or where we have a legal right or duty to use or disclose your information (including for crime and fraud prevention and related purposes).
- In addition, we may collect anonymised details about visitors to our Website for the purposes of aggregate statistics or reporting purposes. However, no single individual will be identifiable from the anonymised details that we collect for these purposes.

HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us 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: apply for our products or services; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- 3. **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

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.



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
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(e) Marketing andCommunications	(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 or take a survey	(a) Identity(b) Contact(c) Profile(d) Marketing andCommunications	 (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 enable you to partake in a prize draw, competition or complete a survey	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing andCommunications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)



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
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)

PROMOTIONAL OFFERS FROM PMG

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, services 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 or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted in to receive that marketing.



THIRD PARTY MARKETING

Currently PMG do not share your data with any Third Party companies. However should we start we will get your express opt-in consent before we share your personal data with any company outside of PMG for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by e-mailing us at customerservices@pmgretail.co.uk or by changing your preferences in your account on our website.

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/service purchase, warranty registration, product/service experience or other transactions.

COOKIE POLICY

What are cookies?

This website uses cookies to collect information. Cookies are small data files which are placed on your computer or other mobile or handheld device (such as smart 'phones or 'tablets') as you browse this website. They are used to 'remember' when your computer or device accesses this website. The cookies are essential to the effective operation of our website and to enable to you shop with us online. Cookies are also used to tailor the products and services offered and advertised to our customers, both on this website and elsewhere.

Information collected

Some cookies collect information about browsing and purchasing behaviour by people who access this website via the same computer or device. This includes information about pages viewed, products purchased and the customer journey around a website. We do not, however, use cookies to collect or record information on users' name, address or other contact details.

Who sets the cookies?

The cookies stored on your computer or other device when you access this website are set by PMG, our suppliers who partner with us to help deliver a high quality website and on-line shopping experience, and other third parties.

Some cookies are set by or on behalf of PMG and are necessary to enable customers to a make purchases on our website.



What are cookies used for?

At PMG we make use of cookies to help manage the site and your visitor experience. These cookies may be used to collect analytics of non-personal visitor activity outlines, manage user logins and personal preferences, provide relevant or timely information to you or offer focused advertisements.

Cookies set across our site, set by our 3rd party partners or us, can be in the form of session or persistent cookies, and may use different technologies, such as JavaScript or Flash. If you would like to 'opt out' of the cookies set by our site, this can be accomplished on a cookie-by-cookie basis subject to browser settings. Should you wish to opt-out then you may find that functions critical to the operation of our site cease to work.

How do I disable cookies?

If you want to disable cookies you need to change your website browser settings to reject cookies. How to do this will depend on the browser you use and we provide further detail below on how to disable cookies for the most popular browsers:-

For Microsoft Internet Explorer:

- 1. Choose the menu "tools" then "Internet Options"
- 2. Click on the "privacy" tab
- 3. Select the setting the appropriate setting

For Mozilla firefox:

- 1. Choose the menu "tools" then "Options"
- 2. Click on the icon "privacy"
- 3. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

- 1. Choose the menu Files"> "Preferences"
- 2. Privacy

What happens if I disable cookies?

This depends on which cookies you disable, but in general the site may not operate properly if cookies are switched off. If you only disable 3rd party cookies you will not be prevented from making purchases on this site. If you disable all cookies you will be unable to complete a purchase on this site.



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.

International transfers

We do not transfer your personal data outside the European Economic Area (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.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by *contacting us*.



Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- 1. Request access to your personal data.
- 2. Request correction of your personal data.
- 3. Request erasure of your personal data.
- 4. Object to processing of your personal data.
- 5. Request restriction of processing your personal data.
- 6. Request transfer of your personal data.

If you wish to exercise any of the rights set out above, please feel free to 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.

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.