

# THINK PROMOTE LTD

## Privacy Policy

### BACKGROUND:

Think Promote Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 2. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 9.
- b) The right to access the personal data we hold about you. Part 8 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 9 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 9 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us for re-use with another service or business in many cases.
- h) We do not do any automated decision making.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 9.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

#### 3. What Personal Data Do We Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Business Address;
- Email address;
- Telephone/Mobile number;
- Business name;
- Job title;
- Profession;
- Payment information;

Your personal data is obtained from the following third party:

- Your officially appointed Think Promote Ltd agent.

#### 4. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one the following purposes:

- Providing and managing your account
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you
- Personalising and tailoring our products and services for you
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that we think we have a legitimate interest to contact you about because you are either a previous customer or interested in our products and services.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

#### 5. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Your personal data will be deleted after a period of 7 years after the last order is in place.

#### 6. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the GDPR or where GDPR standards of privacy are upheld.

#### 7. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following important exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery, gift suppliers and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

## 8. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 9. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 21 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 9. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Emma Keen):

Email address: [emma@thinkpromote.co.uk](mailto:emma@thinkpromote.co.uk)

Telephone number: 01273 495199

Postal Address: Unit 20 Mackley Industrial Estate, Henfield Road, Small Dole, West Sussex, BN5 9XR

## 10. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.