

## **Privacy Notice**

### **INTRODUCTION**

Here at Tax Service Ltd ('TS') we are committed to protecting and respecting the privacy of your personal data. This privacy notice explains how your data is collected, used, transferred and disclosed by boohoo. It applies to data collected when you use our websites, iOS and android applications, when you interact with us through social media, email, or phone, or when you participate in our competitions or events. It covers:

- The personal data we collect
- How we collect your data
- How we use your data
- Marketing preferences, adverts and cookies
- Links to other websites and third parties
- How we share your data
- Your rights
- Changes to this privacy notice
- How to contact us

### **OUR COMMITMENT TO YOU**

We take the protection of your personal data seriously and will process your personal data fairly, lawfully and transparently. This privacy notice describes the personal data we are collecting about you and how it is used.

We will only collect and use your personal data for the following purposes, to:

- fulfil your order(s)
- keep you up to date with the latest offers and trends
- give you a better shopping experience
- help us to make our marketing more relevant to you and your interests
- improve our services
- meet our legal responsibilities
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### **HOW WE KEEP YOUR DATA SAFE AND SECURE**

We have appropriate organisational safeguards and security measures in place to protect your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

The communication between your browser and our website uses a secure encrypted connection wherever your personal data is involved.

We require any third party who is contracted to process your personal data on our behalf to have security measures in place to protect your data and to treat such data in accordance with the law.

In the unfortunate event of a personal data breach, we will notify you and any applicable regulator when we are legally required to do so.

### **THE PERSONAL DATA WE COLLECT**

Personal data means any information about an individual from which that person can be identified. It does not include anonymised data, where the identity and identifying information has been removed.

While our website is designed for a general audience, we will not knowingly collect any data from children under the age of 13 or sell products to children. If you are under the age of 13, you are not permitted to use or submit your data to the website.

The following groups of personal data are collected:

Identity Data includes information such as: first name, last name, title, date of birth (optional), occupation, personal description, photo and gender.

Contact Data includes information such as: email address, billing address, delivery address, location, country, telephone number, loyalty programme membership number, and social media id (if you log in by social media).

Financial Data includes information such as: payment card details and bank account.

Transaction Data includes information such as: details of your purchases and the fulfilment of your orders (such as basket number, order number, subtotal, title, currency, discounts, shipping, number of items, product number, single item price, category, tax etc.); payments to and from you and details of other products and services you have obtained from us, correspondence or communications with you in respect of your orders, and details of any rewards and bonuses awarded.

Technical Data includes information such as: details of the device(s) you use to access our services, your internet protocol (IP) address, login data, your username and password, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.

Profile Data includes information such as: purchases or orders made by you, product and style interests, preferences, feedback, and survey responses.

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 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.

## HOW WE COLLECT YOUR DATA

We may collect personal data about you in the following ways:

Direct interactions – you may give us your Identity, Contact, Financial, Transaction, Profile, and Marketing and Communications data (as described above) by filling in forms, entering information online or by corresponding with us by post, phone, email, telephone or otherwise. This includes personal data you provide, for example, when you:

- Create an account or purchase products on our website;
- Subscribe to our newsletter, discussion boards, social media sites or create wish lists;
- Enter a competition;
- Join a TS loyalty programme;
- Complete a voluntary market research survey;
- Contact us with an enquiry or to report a problem (by phone, email, social media, or messaging service);
- Use a “refer a friend” function on our website; or
- When you log in to our website via social media.

Automated technologies or interactions – as you interact with our website, we may automatically collect the following types of data (all as described above): Technical Data about your equipment, Usage Data about your browsing actions and patterns, and Contact Data where tasks carried out via our website remain uncompleted, such as incomplete orders or abandoned baskets. We collect this data by using cookies, server logs and other similar technologies. Please see our Cookies Policy for further details.

Third parties – we may receive personal data about you from various third parties, including:

- Technical Data from third parties, including analytics providers such as Google. Please see further information in the section entitled ‘Marketing preferences, adverts and cookies’.

- Technical Data from affiliate networks through whom you have accessed our website;
- Identity and Contact Data from social media platforms when you log in to our website using such social media platforms;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact data from third parties, including organisations (including law enforcement agencies), associations and groups, who share data for the purposes of fraud prevention and detection and credit risk reduction;

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## HOW WE USE YOUR DATA

The legal basis for processing your personal data

We will only collect and process your personal data where we have a legal basis to do so. As a data controller, the legal basis for our collection and use of your personal data varies depending on the manner and purpose for which we collected it.

We will only collect personal data from you when:

- we have your consent to do so, or
- we need your personal data to perform a contract with you. For example, to process a payment from you, fulfil your order or provide customer support connected with an order, or
- the processing is in our legitimate interests and not overridden by your rights, or
- we have a legal obligation to collect or disclose personal data from you.

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## HOW LONG WE KEEP YOUR DATA FOR

We will keep your personal data for no longer than is necessary for the purpose(s) it was provided for and to meet our legal obligations. Further details of the periods for which we retain data are available on request.

## MARKETING PREFERENCE, ADVERTS & COOKIES

Marketing - your preferences

We may send you marketing communications and promotional offers:

- if you have opened an account with us or purchased goods from us, or registered for a promotion or event, and you have not opted out of receiving that marketing (in accordance with your preferences, as explained below);
- by email if you have signed up for email newsletters;
- if you have provided us with your details when you entered a competition and you have consented to receiving such marketing (in accordance with your preferences, as explained below).

We may use your Identity, Contact, Technical, Transactional, Usage, Profile Data and Marketing and Communications Data to form a view on what we think you may like, or what may be of interest to you, and to send you details of products and offers which may be relevant for you.

We will ask you for your preferences in relation to receiving marketing communications by email, post, SMS and other communication channels.

From time to time we may also include with your order, inserts advertising goods, services or offers from other third-party companies that you may be interested in.

In respect of third party marketing communications, we will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us (or any third party, if applicable) at any time:

- you can unsubscribe or 'opt-out' by using the unsubscribe button and following the link included in the footer of any marketing email; or
- account holders may withdraw their consent by simply logging in to 'My Account' [here](#) and editing your 'Contact Preferences'.

We will process all opt-out requests as soon as possible, but please note that due to the nature of our IT systems and servers it may take a few days for any opt-out request to be implemented. Please be aware that opting out on one of our Services, does not opt you out from any of our other Services unless that option is specifically provided. Please note that despite unsubscribing from such communications, TS may still contact you in relation to your order(s), purchase(s) or any issues relating any business you conduct with TS

## COOKIES

Our website uses cookies to distinguish you from other users of our website and to keep track of your visits. They help us to provide you with the very best experience when you browse our website and to make improvements to our website. They also help us and our advertising networks to make advertising relevant to you and your interests.

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 detailed information on the cookies which we and our third-party providers use and the reasons why we use them, please refer to our 'Cookie Policy'.

## ONLINE ADS

We use online advertising to keep you aware of what we're up to and to help you find our products. Like many companies, we may target TS banners and ads to you when you use other websites and apps, based on your Contact, Technical, Usage and Profile Data. We do this using a variety of digital marketing networks and ad exchanges, and a range of advertising technologies such as web beacons, pixels, ad tags, cookies, and mobile identifiers, as well as specific services offered by some sites and social networks, such as Facebook's Custom Audience Service.

## OUR USE OF ANALYSIS & TARGETING TOOLS

We use a range of analytics and targeted advertising tools to display relevant website content on our website and online advertisements on other websites and apps (as described above) to you, deliver relevant content to you in marketing communications (where applicable), and to measure the effectiveness of the advertising provided. For example, we use tools such as Google Analytics to analyse Google's interest-based advertising data and/or third-party audience data (such as age, marital status, life event,

gender and interests) to target and improve our marketing campaigns, marketing strategies and website content. We may also use tools provided by other third parties, such as Facebook and others to perform similar tasks, using your Contact, Technical, Usage and Profile Data.

In order to opt out of targeted advertising you need to disable your 'cookies' in your browser settings (see Cookie Policy for details) or opt-out of the relevant third-party Ad Settings. For example, you can opt-out of the Google Display Advertising Features using their Ad Settings. As an added privacy measure, you can also use the Google Analytics opt-out browser add on.

The Digital Advertising Alliance (which includes companies such as Google, Facebook and others) provides a tool called WebChoices that can perform a quick scan of your computer or mobile devices, find out which participating companies have enabled customised ads for your browser, and adjust your browser preferences accordingly.

If you would like any further information about the data collected by these third parties or the way in which the data is used, please contact us.

### **LINKS TO OTHER WEBSITES & THIRD PARTIES**

Our website may include links to and from the websites of our partner networks, advertisers and affiliates, or to social media platforms. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to their websites.

### **HOW WE SHARE YOUR DATA**

We may disclose and share your personal data with the parties set out below:

- where you have consented for us to do so. For example, if you have consented to receive marketing materials from third parties, or in respect of third parties' (including co-branded or jointly promoted) products and services, we may pass your data on to the relevant third parties for the purpose of sending you such marketing communications;
- to other companies within the boohoo Group which carry out order fulfilment and provide HR, financial, IT, facilities, customer service, legal, travel and health and safety support functions.
- to business partners, suppliers, sub-contractors and other third parties that we use in connection with the running of our business for the purposes set out in the table above in the section 'How we use your data', such as:
  - third party service providers that we engage to provide IT systems and software, and to host our website;
  - third-party payment processing services (including Paypal, and others) to process your payment to us. TS does not store your payment information. Your payment details are provided to the payment processing service you have selected, who are required to comply with applicable regulations and data protection laws. Please refer to the privacy policy of the relevant provider for details of how they process your personal data. These third party payment providers process your data as a data controller;
  - third party service providers that we engage to deliver goods you have ordered and to manage any returns;
  - third party service providers that we engage to send emails and postal mail on our behalf including in relation to incomplete orders or abandoned baskets, or marketing communications, to provide data cleansing services and to provide marketing and advertising services;
  - analytics and search engine providers that assist us in the improvement and optimisation of our website;
  - affiliate networks through whom you have accessed our website;

- to any third party 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.
- to protect our customers and website from fraud and theft, we may share your personal data with fraud prevention and analysis service providers, in order to carry out fraud prevention checks on our behalf. If personal data is provided to fraud prevention and analysis service providers will also use this personal data to improve its service and machine learning to improve its automated processing. We may further share personal data that is required to make identity checks and personal data that we obtain from making identity checks (including data relating to your age, name and location), together with account information, with organisations (including law enforcement agencies), involved in fraud prevention and detection and credit risk reduction. Please note that these third parties may retain a record of the information that we provide to them for this purpose;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or
- to our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

## **YOUR RIGHTS**

You have several rights under the data privacy legislation. This includes, under certain circumstances, the right to:

- request access to your personal data
- request correction of your personal data
- request erasure of your personal data
- request restriction of processing of your personal data
- request the transfer of your personal data
- object to processing of your personal data
- request human intervention for automated decision making

Brief details of each of these rights are set out below. If you wish to exercise any of these rights, please email us at [info@1000bees.com](mailto:info@1000bees.com)

### **REQUEST ACCESS TO YOUR PERSONAL DATA**

You have the right to obtain a copy of the personal data we hold about you and certain information relating to our processing of your personal data.

### **REQUEST CORRECTION TO YOUR PERSONAL DATA**

You are entitled to have your personal data corrected if it is inaccurate or incomplete. You can update your personal data at any time by logging into your account and updating your details directly, or by emailing us at [info@1000bees.com](mailto:info@1000bees.com)

### **REQUEST ERASURE OF YOUR PERSONAL DATA**

This enables you to request that TS delete your personal data, where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **REQUEST RESTRICTION OF PROCESSING YOUR PERSONAL DATA**

You have a right to ask TS to suspend the processing of your personal data in certain scenarios, for example if you want us to establish the accuracy of the data, or you have objected to our use of your data but we need to verify whether we have overriding

legitimate grounds to use it. Where processing is restricted, we are allowed to retain sufficient information about you to ensure that the restriction is respected in future.

### **REQUEST THE TRANSFER OF YOUR PERSONAL DATA**

You have the right to obtain a digital copy of your personal data or request the transfer of your personal data to another company. Please note though that this right only applies to automated data which you initially provided consent for us to use or where we used the data to perform a contract with you.

### **OBJECT TO PROCESSING OF YOUR PERSONAL DATA**

You have the right to object to the processing of your personal data where we believe we have a legitimate interest in processing it (as explained above). You also have the right to object to our processing of your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms.

### **REQUEST HUMAN INTERVENTION FOR AUTOMATED DECISION MAKING & PROFILING**

You have the right to request human intervention where we are carrying out automated decision making when processing your personal. This form of processing is permitted where it is necessary as part of our contract with you, providing that appropriate safeguards are in place or your explicit consent has been obtained.

We will 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. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of the above rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

### **RIGHT TO LODGE A COMPLAINT**

If you have any concerns or complaints regarding the way in which we process your data, please email us directly at [info@1000bees.com](mailto:info@1000bees.com). You also have the right to make a complaint the data protection regulator. We would, however, appreciate the chance to deal with your concerns before you approach the data protection regulator, so please do contact us in the first instance.

### **CHANGES TO THE PRIVACY NOTICE**

From time to time we may change this privacy notice. If there are any significant changes we will post updates on our website, applications or let you know by email.

### **HOW TO CONTACT US**

We welcome feedback and are happy to answer any questions you may have about your data.

Please send any questions, comments or requests for more information to our nominated representative and Data Protection who can be contacted at [info@1000bees.com](mailto:info@1000bees.com).

This privacy notice was last updated on 25th April 2020  
Tax Service Limited

## Cookie Policy

It's not the ones you eat (bummer). Cookies are small files of text and numbers which are downloaded to your device when you visit a website if you agree to the website doing so. Cookies are then sent back to the website on each subsequent visit, or by other websites that recognise that cookie.

Cookies are useful because they allow a website to recognise a user's device and are widely used in order to let you navigate between pages more efficiently, remember your preferences, and generally improve your user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

The family of websites operated by or on behalf of TS (the "Services"), including, but not limited to, websites located at [www.1000bees.com](http://www.1000bees.com), our mobile application(s), our blog(s), and any other website(s) owned and/or operated by TS and any of their associated webpages, are committed to implementing policies and procedures designed to protect your privacy and security, in addition to providing you with the best possible online experience. We use cookies to distinguish you from other users of TS. By continuing to browse the website, you are agreeing to our use of cookies.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services and advertising performance analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or tracking/targeting/advertising cookies.

Unless you have blocked cookies, our system will issue cookies and download them onto your device when you use our Services. However, if you do block cookies (including essential cookies) you may not be able to access all or parts of our Services.