

# Privacy notice: Customers and Marketing

## Summary

We use your personal data to provide you with the products or services we sell or to send you our marketing materials where you have given consent.

We respect your personal data and take its security very seriously.

- We only hold what data we need for the purpose for which we obtained it.
- We delete your data when it has reached the end of its retention period.
- You have privacy rights.
- We are happy to answer your questions. Our contact details can be found at the end of this notice.

## What data we hold

If you purchase goods from us, we will hold your name, contact details and payment details.

To be on our email list, we hold your name, email address and you may wish to tell us your school details (although this isn't necessary)

We also generate log files from various servers. This will include an IP address assigned to you or to your internet service provider.

## How we use your personal data

References to the legal basis for processing of your personal data (e.g. "(Basis: Art. 6(f).)") are a reference to the [article of the General Data Protection Regulation](#). Each piece of personal data that we process must have a legal basis.

## If you buy goods from us

If you purchase products from us, either by our website or over the phone, we will need to process your data in order to provide you with the goods that you have ordered. We need to process payment details in order to fulfil the contract. We will retain your personal data for 7 years after our contract has ended

We also occasionally send out postal marketing to our customers. You can opt out of this at any time.

*(Basis: Art. 6(b): processing is necessary for the performance of a **contract**, Art. 6(f): sending postal marketing to our customers is a legitimate activity for a business)*

## If you make an enquiry

We keep a record of enquiries received, to help us plan our business strategy and check that we are offering what potential clients want.

*(Basis: Art. 6(f): business planning is a **legitimate** activity for a business.)*

## If you are on our marketing list

If you sign up for our email marketing list, we will send you regular emails outlining special offers and new lines. You are able to unsubscribe from this list at any time. If you do unsubscribe, we will ensure that you aren't accidentally added back into our list by keeping your email address in a suppression list.

We keep a record of enquiries received, to help us plan our business strategy and check that we are offering what potential clients want.

*(Basis: Art. 6(a): You are on our email list because you've consented and 'double opted in' to receiving email marketing. Art. 6(f): Ensuring you stay opted out of our list by keeping your email details on a suppression list is a **legitimate** activity for a business)*

## Technical data

We use the logs from our servers to help with our company's security as well as to look at visitor behaviour (e.g. which website pages get the most traffic or are the most popular).

*(Basis: Art. 6(c): we have a legal obligation to protect the data of our clients and our staff. Art. 6(f): strategy planning is a legitimate activity for a business.)*

## Your data and transfers outside of the EEA

We use Google, which is based in the USA. However adequate safeguards are in place as these organisations are certified to the EU-US Privacy Shield Framework.

## Your rights

You have rights in respect of our processing of your personal data which are:

- To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people). To rectify incorrect personal data that we are processing.
- To request that we erase your personal data if:
  - we no longer need it;
  - if we are processing your personal data by consent and you withdraw that consent;
  - if we no longer have a legitimate ground to process your personal data; or
  - we are processing your personal data unlawfully
- To object to our processing if it is by legitimate interest.
- To restrict our processing if it was by legitimate interest.
- To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.

If you want to exercise any of these rights, please contact us using the details at the end of this notice.

You also have the right to lodge a complaint about our processing the UK's [Information Commissioner's Office](#).

## Third parties

As a prospective customer, we will not transfer your personal data to third parties at this stage except the following:

- Companies that provide services to us. Our telephone service providers will get to see your phone number if we call you and our broadband supplier which could see your email address (but not the content of what you send us, if you encrypt it).
- In response to a court order. It is possible, though unlikely, that we might be forced to disclose your information in response to a court order.

As a customer, we transfer your data to the following third parties:

- We use Google as our company email service. We also share with IT professionals who not only ensure that our systems run smoothly, but are also committed to the highest standards of data protection compliance.
- We also use an external Accountant but, unless you are a sole trader or a partnership, they are unlikely to see any personal data relating to you.
- We use an external marketing agency who assist us with our digital marketing and a company who assist us with our website.
- If you order goods from us online your payment will go through Sagepay.
- If you order goods from us, we will pass your personal data onto delivery companies so that we are able to fulfil our contract to you.
- We sometimes use external printers to fulfil personalised orders and if you receive postal marketing your name and postal address will be shared with our mailing house.
- In response to a court order. It is possible, though unlikely, that we might be forced to disclose your information in response to a court order.
- If you do not pay your bills, we may choose to engage a third party to recover any money you owe us.

## Technical security

We use cookies to improve the quality of service to our customers on our website and on the internet as a whole, this will include a mobile identifier such as your IP or MAC address.

We monitor how the website is used, which pages are popular, what pages people leave the site on etc. for the purpose of service improvements.

We also monitor which pages are visited to make sure our advertising campaigns are targeted at the right people and are therefore more likely to be relevant to our customers.

### Retention periods

This is the length of time that we will continue to process or store your personal data.

Data about enquiries: 7 years on our secure database.

Data about clients: We will store your data for 7 years after your contract ends for accountancy and tax purposes.

### ICO registration

Brainwaves Rewards Ltd is registered with the Information Commissioner's Office (Z1914277).

### Contact us

Brainwaves Rewards Ltd

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