

## **I. BASKET DIGITAL PRIVACY POLICY**

We are committed to protecting the privacy of all visitors to the Website, including all visitors who access the Website or Service through any mobile application or other platform or device. Please read the following Privacy Policy which explains how we use and protect your information.

Basket Digital is committed to protecting your Personal Data and giving you a personalised service that meets your needs, it adheres to the Data Protection Act 1998 and the General Data Protection Regulation (GDPR 2018); we are registered with the Information Commissioner's Office (no. ZA477137).

By visiting and/or using the Service on the Website, you agree and where required you consent to the collection, use and transfer of your information as set out in this policy.

### **1. OUR POLICY AND CONTACTING US**

1.1. Any personal data which we collect, record or use in any way whether it is held on paper, on computer or other media will have appropriate safeguards applied to it to ensure that we comply with the Data Protection Act 1998. We fully endorse and adhere to the eight principles of Data Protection as set out in the Data Protection Act 1998 and the GDPR 2018. The Data Protection Act principles state that personal data must be:

1.1.1. Fairly and lawfully processed

1.1.2. Processed for limited purposes and not in any other way which would be incompatible with those purposes

1.1.3. Adequate, relevant and not excessive

1.1.4. Accurate and kept up to date

1.1.5. Not kept for longer than necessary

1.1.6. Processed in line with the data subject's rights

1.1.7. Kept secure

1.1.8. Not transferred to a country which does not have adequate data protection laws.

1.2. Our purpose for holding personal data and a general description of the categories of people and organisations to whom we may disclose it are listed in the Data Protection register and we are registered with the Information Commissioner with registration number ZA477137.

1.3. For the purposes of the Data Protection Act 1998, BASKET DIGITAL Ltd. is the Data Controller. Basket Digital Ltd. is registered with company number 11573458 in the United Kingdom. Our registered office and principal place of business is at 8 Kenton Avenue, Wolverhampton, WV6 0RG, United Kingdom.

1.4. If you have any questions about how we collect, store and use personal information, or would like to update your information or if you have any other privacy related questions, please contact us by email at [info@basket.digital](mailto:info@basket.digital) or write to the Legal Department at the above address.

1.5. In order to meet the requirements of the Data Protection Act principles, we will:

1.5.1. Observe the conditions regarding the fair collection and use of personal data

1.5.2. Meet our obligations to specify the purposes for which personal data is used

1.5.3. Collect and process appropriate personal data only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements

1.5.4. Ensure the quality of personal data used

1.5.5. Apply strict checks to determine the length of time personal data is held

1.5.6. Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act

1.5.7. Take appropriate security measures to safeguard personal data

1.5.8. Ensure that personal data is not transferred abroad without suitable safeguards.

## 2. INFORMATION THAT WE COLLECT FROM YOU

2.1. When you visit the Website or use the Service to make an Order from a Vendor through the Website, you may be asked to provide information about yourself including your name, contact details (such as telephone and mobile numbers and e-mail address) and payment information (such as credit or debit card information). We may also collect information about your usage of the Website and Service and information about you from the materials (such as messages and reviews) you post to the Website and the e-mails or letters you send to us.

2.2. By accessing BASKET DIGITAL information and/or the Website or Service using mobile digital routes such as (but not limited to) mobile, tablet or other devices/technology including mobile applications, then you should expect that our data collection and usage as set out in this Privacy Policy will apply in that context too. We may collect technical information from your mobile device or your use of the Website or the Service through a mobile device, for example, location data and certain characteristics of, and performance data about, your device, carrier/operating system including device and connection type, IP address, mobile payment methods, interaction with other retail technology such as use of NFC Tags, QR Codes or use of mobile vouchers. Unless you have elected to remain anonymous through your device and/or platform settings, this information may be collected and used by us automatically if you use the Website or Service through your mobile device(s) via any BASKET DIGITAL mobile application, through your mobile's browser or otherwise.

## 3. USE OF YOUR INFORMATION

3.1. Your information will enable us to provide you with access to the relevant parts of the Website and to supply the Service. It will also enable us to bill you and enable us and/or a Vendor with whom you have placed an Order to contact you where necessary concerning the Service. For example, we and/or the Vendor

may use your information to provide you with status updates or other information regarding your Order by e-mail, telephone, mobile or mobile messaging (e.g. SMS, MMS etc.). We will also use and analyse the information we collect so that we can administer, support, improve and develop our business, for any other purpose whether statistical or analytical and to help us prevent fraud. Where appropriate, now and in the future you may have the ability to express your preferences around the use of your data as set out in this Privacy Policy and this may be

exercised through your chosen method of using the Service, for example mobile, mobile applications or any representation of the Website.

3.2. We may use your information to contact you for your views on the Service and to notify you occasionally about important changes or developments to the Website or the Service.

3.3. Where you have indicated accordingly, you agree that we may use your information to let you know about our other products and services that may be of interest to you including services that may be the subject of direct marketing and we may contact you to do so by post, telephone, mobile messaging (e.g. SMS, MMS etc.) as well as by e-mail.

3.4. Where you have indicated accordingly, you agree that we may also share information with third parties (including those in the food, drink, leisure, marketing and advertising sectors) to use your information in order to let you know about goods and services which may be of interest to you (by post, telephone, mobile messaging (e.g. SMS, MMS etc.) and/or e-mail) and to help us analyse the information we collect so that we can administer, support, improve and develop our business and services to you.

3.5. If you do not want us to use your data in this way or change your mind about being contacted in the future, please let us know by using the contact details set out in paragraph 7 below and/or amending your profile accordingly.

3.6. Please note that by submitting Reviews regarding the Website, Service and/or Vendors, you consent to us to use such Reviews on the Website and in any marketing or advertising materials. We will only identify you for this purpose by your first name and the city in which you reside (and any other information that you may from time to time consent to us disclosing).

#### 4. DISCLOSURE OF YOUR INFORMATION

4.1. The information you provide to us will be transferred to and stored on our servers which may be in or outside the European Economic Area, and may be accessed by or given to our staff working outside the United Kingdom and third parties including companies within the BASKET DIGITAL group of companies (which means our subsidiaries and affiliates, our ultimate holding company and its subsidiaries and affiliates) who act for us for the purposes set out in this policy or for other purposes notified to you from time to time in this policy. Countries outside the European Economic Area do not always have strong data protection laws. However, we will always take steps to ensure that your information is treated in accordance with this policy.

4.2. The third parties with whom we share your information may undertake various activities such as processing credit card payments and providing support services for us. In addition, we may need to provide your information to any Vendors that you have placed an Order with so as to allow the Vendor to process and deliver your Order. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

4.3. If you have consented we may allow carefully selected third parties, including marketing and advertising companies, our affiliates and associates, to contact you occasionally about services that may be of interest to you. They may contact you by post, telephone, mobile messaging (e.g. SMS, MMS, etc.) as well as by e-mail. If you change your mind about being contacted by these companies

in the future, please let us know by using the contact details set out in paragraph 7 below and/or by amending your profile accordingly.

4.4. If our business enters into a joint venture with, purchases or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, our new business partners or owners or their advisors.

4.5. We may use the information that you provide to us if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; or in order to enforce the Website Terms and any other agreement; or to protect our rights or the rights of Vendors or other third parties. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention.

## 5. SECURITY AND DATA RETENTION

5.1. We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. We will keep your information for a reasonable period or as long as the law requires.

5.2. Where you have chosen a password which allows you to access certain parts of the Website, you are responsible for keeping this password confidential. We advise you not to share your password with anyone. Unless we negligently disclose your password to a third party, we will not be liable for any unauthorised transactions entered into using your name and password.

5.3. The transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 6. ACCESSING AND UPDATING

6.1. You have the right to see the information we hold about you ("**Access Request**") and to ask us to make any changes to ensure that it is accurate and up to date. If you wish to do this, please contact us using the contact details set out in paragraph 7 below. In the event that you make an Access Request, we reserve the right to charge a fee of ten pounds (£10.00) to meet our costs in providing you with details of the information we hold about you.

## 7. CHANGES TO OUR PRIVACY POLICY

7.1. Any changes to our Privacy Policy will be posted to the Website and, where appropriate, through e-mail notification.

## 8. CONTACT



8.1. All comments, queries and requests relating to our use of your information are welcomed and should be addressed to BASKET DIGITAL Ltd. at 8 Kenton Avenue, Wolverhampton, United Kingdom, WV6 0RG, or by telephone to 01902212371

## **II. BASKET DIGITAL COOKIES POLICY**

### **About Cookies & How We Use Them**

A cookie is a tiny text file that records actions that you make on a website. All transactional/ ecommerce sites require these so that you are able to “Add” items to shopping carts that remain there throughout the duration of your visit. This allows you to add multiple different products in one visit and purchase once your browsing is complete, should you wish to do so. We do not collect personal data from these and they are only used in order to make your shopping experience more convenient and enjoyable.

As well as these we use other cookies that improve our website so that it is more user friendly, contains richer content for you and offers a more relevant experience to you as an individual and valued customer. For example, cookies that “remember” you from previous visits to our sites so that we can offer you relevant products and automatically sign you in to your account on reaching the site; also cookies that allow “streaming” from other sites and enable us to play videos and display twitter feeds direct from our accounts on various well known social media platforms. In addition to these, we also use cookies to monitor certain performance statistics, i.e. what search term brought you to our website, whether you are on a PC or mobile device, how long you stayed on our site etc. We solely use these for the purpose of improving our service and understanding our customers on a intentions on a larger scale, so that we can work towards improving our site and making sure that we deliver the best service.

Whilst we look into different ways of allowing you to personally control what cookies you allow, please see here for instructions on how to manage cookies on your browser >>>

<http://www.allaboutcookies.org>

Please note: Certain areas of the website and certain functions will not be available to you as a result of disabling your cookies. We assure you that under no certain circumstances do we collect and access any personal information or use this for any other means than to improve your visit to our site. We hope that you understand the information provided above.