# Privacy Statement when using <u>buyatab.com/custom/halfords</u>

#### 1. Introduction

Halfords Group plc ("**Halfords**") is the UK's leading retailer of bicycles, car parts, car enhancement, camping and touring equipment.

Specifically to help our customers in the run-up to Christmas, we have introduced a Christmas Bike Club Card which allows you to reserve a bike for a minimum of £10 (or €10 in the Republic of Ireland), and then top up the Card in-store or using this website until the time of collection.

We have appointed Stored Value Solutions UK Limited ("SVS") who own Buyatab, to manage the online Christmas Bike Club Card service on our behalf. As such, SVS acts as "Data Controller" in respect of the information gathered and processed by this website.

In order that you are reliably informed about how SVS operates, we have developed this Privacy Statement. It describes the ways in which SVS collects, processes, stores and shares information about you as a result of you visiting this site. This Privacy Statement also advises you about how you can have control over our use of your data.

If you have any comments or queries regarding the use of your data on this website, please contact Halfords' Data Protection Officer by email at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a> or by post at Data Protection Officer, Halfords Limited, Icknield Street Drive, Washford West, Redditch B98 0DE.

# 2. What information do we collect about you?

In summary, SVS collects information about customers using this website, so that it can administer the Halfords' Christmas Bike Club Card service.

The information that is needed for this purpose is known as your "personal data". This includes your name, home address and e-mail address which SVS collects via forms on this website, or which you may provide directly if you call the Christmas Bike Club Card helpline.

Please be advised that by using this website, SVS will not be collecting any special category data about you (i.e. data about your ethnicity, religion, health etc).

Please also be advised that when you visit this website, cookies will be used to collect information about you such as your Internet Protocol (IP) address which connects your computer or mobile device to the internet. For further information, please refer to our Cookies Policy <a href="here">here</a>.

# 3. How will we use that information?

SVS uses the data collected from customers for the specific purposes listed in the table below. Please note that this table also explains:

- the lawful basis for processing customer data, linked to each processing purpose;
- in what circumstances customer data will be shared with a third-party organisation;
   and
- for how long SVS keep customer data collected by this website.

Data that is collected by cookies is not included in the table below, but is explained in section 3 of our Cookies Policy <u>here</u>.

Purpose for processing data	Lawful basis for processing data	Third party organisations with whom data is shared	Data retention period
To enable customers to top-up their Halfords' Christmas Bike Club Card online	To meet the requirements of contract law	SVS uses cloud hosting services to store the customer data	6 years after the customer's last interaction
To process credit / debit card payments in respect of top-ups made online	To meet the requirements of contract law	SVS uses a dedicated online payment solution, and fraud and chargeback prevention technology	Credit card data is not retained by SVS
To provide customers with email receipts of their Christmas Bike Club Card transactions	This is deemed legitimate as it is in customers' interest to receive a receipt of their online transactions	SVS uses cloud hosting services to store the customer data	6 years after the customer's last interaction
To provide customer support by telephone or online LiveChat: this includes the recording of telephone conversations for monitoring and quality purposes	This is deemed legitimate as it is in customers' interest that SVS can access their data in order to resolve any queries, concerns or complaints	SVS uses customer services software to enable them to manage enquiries quickly and efficiently	6 years after the customer's last interaction (NB telephone call recordings will only be kept for 90 days)

Please be advised that if you store your Halfords' Christmas Bike Club Card in an Apple or Samsung electronic wallet, you may be sent notifications about your purchase. If you do not wish to receive these, you will need to change your Apple or Samsung settings.

#### 4. Overseas transfers

To administer the Halfords' Christmas Bike Club Card online service, customer data is processed in North America, and specifically the United States.

Please be assured that whenever data is processed outside the European Economic Area ("**EEA**"), we ensure that the relevant third parties observe appropriate technical and organisational security measures in order to protect the data against unauthorised access, disclosure, alteration or destruction. We also validate that these third parties operate equivalent data protection and security practices as organisations based within the EEA.

# 5. Your rights

Under the terms of data protection legislation, you have the following rights as a result of using this website:

# 5.1 Right to be informed

This Privacy Statement, together with our Cookies Policy, fulfils our obligation to tell you about the ways in which we use your information as a result of you using this website.

#### 5.2 Right to access

You have the right to ask us, in writing, for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain this information at no cost. We will send you a copy of the information within 30 days of your request. To make a Subject Access Request, please write to Halfords' Data Protection Officer at Halfords Limited, Icknield Street Drive, Washford West, Redditch B98 0DE.

## 5.3 Right to rectification

If any of the information that is held about you is inaccurate, you can contact Halfords' Data Protection Officer at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a>. Any corrections that you request will be made as soon as possible, and certainly no later than 30 days following your notification.

## 5.4 Right to be forgotten

You can ask that SVS erases all personal information held about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information, please contact Halfords' Data Protection Officer at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a>.

# 5.5 Right to object

You have the right to object to the continued use of your data for any purpose listed in section 3 of this Privacy Statement for which the lawful basis of processing is that it has been deemed legitimate. Please contact Halfords' Data Protection Officer at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a>. Please note that you can also exercise your right to object to our use of cookies by following the guidance in section 4 of our Cookies Policy <a href="mailto:here">here</a>.

# 5.6 Right to restrict processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact Halfords' Data Protection Officer at dataprotectionofficer@halfords.co.uk.

## 5.7 Right to data portability

If you would like us to move, copy or transfer the data that we hold about you to another organisation, please contact Halfords' Data Protection Officer at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a>. Please be advised that this only applies to certain data which has been submitted by you electronically for specific purposes only. The Data Protection Officer can provide further advice.

#### 5.8 Rights related to automated decision-making

We do not use automated decision-making processes in relation to any information collected via this website.

# 6. Data privacy and security

Both Halfords and SVS take customer privacy very seriously, and therefore ensure that data protection is a key consideration of all new and existing IT systems. Where any concerns, risks or issues are identified, we conduct impact assessments in order to determine any actions that are necessary to ensure optimum compliance with data protection legislation.

We also maintain an active information security work programme which seeks to protect the availability, confidentiality and integrity of all physical and information assets. Specifically, this helps us to:

- protect against potential breaches of confidentiality;
- ensure all IT facilities are protected against damage, loss or misuse;
- increase awareness and understanding of the requirements of information security, and the responsibility of our colleagues to protect the confidentiality and integrity of the information that they handle; and
- ensure the optimum security of this website.

We recognise that the security of data and transactions on this website is of primary importance. We therefore ensure that all connections to secure parts of the website are encrypted and authenticated using strong protocols, key exchanges and ciphers.

#### 7. Disclaimers

Every effort is made to ensure that the information provided on this website, and in this Privacy Statement, is accurate and up-to-date, but no legal responsibility is accepted for any errors or omissions contained herein.

We cannot accept liability for the use made by you of the information on this website or in this Privacy Statement, nor do we warrant that the supply of the information will be uninterrupted. All material accessed or downloaded from this website is obtained at your own risk. It is your responsibility to use appropriate anti-virus software.

This Privacy Statement applies solely to the data collected by us, and therefore does not also apply to data collected by third party websites and services that are not under our control. Furthermore, we cannot be held responsible for the Privacy Statements on third party websites, and we advise users to read these carefully before registering any personal data.

## 8. Accessibility

We are committed to providing a website in which content is accessible to everyone. We therefore update our website regularly in order to make it as adaptable as possible.

For example, users can control the text size of each page within their browser. On a PC, holding the "Ctrl" key while pressing the "+" (plus) key will increase text size, and holding the "Ctrl" key while pressing the "-" (minus) key will decrease the text size.

# 9. General

Questions and comments regarding this Privacy Statement are welcomed, and should be sent to Halfords' Data Protection Officer at <a href="mailto:dataprotectionofficer@halfords.co.uk">dataprotectionofficer@halfords.co.uk</a>.

You can also contact Halfords' Data Protection Officer if you have any concerns or complaints about the ways in which your personal data has been handled as a result of you using this website.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted at Wycliffe House, Water Lane, Wilmslow SK9 5AF or <a href="https://ico.org.uk">https://ico.org.uk</a>.