

Privacy Policy

Last updated on Jan 3rd, 2019.

BY USING OR ACCESSING THE SITES YOU CONFIRM THAT YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITES. WE RESERVE THE RIGHT TO REVISE THIS PRIVACY POLICY AT ANY TIME BY UPDATING THIS PAGE AND YOUR USE AFTER SUCH CHANGE CONFIRMS YOUR ACCEPTANCE OF THE CHANGED TERMS. PLEASE CHECK THIS PRIVACY POLICY PERIODICALLY FOR CHANGES. Capitalized terms used but not defined in this Privacy Policy shall have the definitions ascribed to such terms in the Terms and Conditions, as applicable.

In order to make your visits to the BeforeTheShop website as responsive as possible, we collect information when you visit the Site. This Privacy Policy explains how Made By Digital collects, shares and uses personal information about you, and how you can exercise your privacy rights.

1. Personal Information collected by Made By Digital.

A. Information Collected Online

General Browsing:

The Site gathers navigational information about the areas of the Sites that visitors visit. This information allows us to see which areas of our Site are most visited and helps us improve the quality of your online experience by providing more of the most visited and desired features and services. Additional information such as domain type, browser version, and service provider may be collected, which provide information regarding the general use of the Site.

Personal Information We Collect:

- The Site collects certain personal information from you when you voluntarily provide us with this information, including name, country of residence, address, gender, date of birth, e-mail address and any other information you choose to provide.
- We may also collect data from your use of the Site which enables us to determine your location. This location information is collected so that we can provide you with the best possible experience, for fraud prevention purposes, and to operate and improve the Site. The Site may not be able to operate properly without collecting this location information.

B. Our Social Media Site Pages

1. Personal information may be collected directly by the Site through certain social media pages and may also be collected by the social media site hosting our social media pages, as applicable.
2. The social media sites where we have our own accounts/pages (for example, on Facebook or Twitter) may provide aggregated information and analysis to us about visitors' use of these social

media pages. This allows us to better understand and analyze our user growth, general demographic information about the users of our social media pages, and users' interaction with content on our social media pages. Overall, this information may be used to help us understand the types of visitors and users of our social media pages and their use of the content.

2. Information We Share With Third Parties

Personal information that you provide will be used for marketing and promotional purposes only by Made by Digital, its group and related companies, and third party companies that we have specially selected to offer you Promotions, products, or services and in accordance with your marketing preferences. We do not otherwise rent or sell to third parties your personal information entered on the Sites.

We make the names and postal addresses in our postal mailing list, sometimes categorized by purchasing information, available to our partners for their marketing purposes provided that you have agreed that we may do so.

Your personal information may be shared with other group companies and with certain third parties solely to allow those third parties to assist us with the operation of the Site and our business.

We may disclose your personal information to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

We will disclose your personal information to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.

3. International data transfers

We may use and store personal information that we collect from you in countries that are outside of the European Economic Area (including the United States of America). Please be aware that countries which are outside the European Economic Area may not offer the same level of data protection as the European Union.

Specifically, our website servers are located in the US and the EU, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

4. Cookies

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you.

5. Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by accessing your personal account.
- In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “Contact Us” heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

6. Legal basis for processing personal information (EEA visitors only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example information included in your proofs of purchase).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “Contact Us” heading below.

7. Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. Privacy Of Children On Our Site

We do not knowingly collect or use any personal information from children under the age of sixteen (16). The site and its content are directed to people who are at least sixteen (16) years of age or older. If you are under the age of sixteen (16), you may not use this web site unless you have the consent of, and are supervised by, a parent or guardian.

9. Links

For your convenience, the Site may contain links to other websites that are not under our control. We are not responsible for them, and this policy does not apply to those websites or any other companies that we do not own or control. The Site does not evaluate and we are not responsible for the privacy practices or the content of such websites. We encourage you to seek out and read the privacy policies on each linked site to ensure that you are comfortable with the other websites' privacy policies and practices.

10. Updates to Privacy Policy

As we continue to offer our visitors new and different types of content and services, the Site may modify our information collection, use, or disclosure practices. Should there be a material change to our information collection, use, or disclosure practices, it will be applied only to information collected on a going forward basis, and we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

11. Security Statement

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. We operate secure data networks provided by industry standard firewall and password protection systems to protect against the loss, misuse and alteration of information under our control. While we use reasonable efforts to safeguard the confidentiality of your information, we cannot guarantee that data will always remain secure due to transmission errors, outside events, third party hacking or other causes outside of our control. We will comply with all privacy laws and make any legally required disclosures regarding breaches of the security, confidentiality, or integrity of personal data consistent with our ability to determine the scope of a breach and our obligations to law enforcement.

12. Contact Us

If you have any questions, comments or concerns regarding our privacy practices, please contact us using the following contact details:

- Email us at hi@madebydigital.com