

# If you need help

Please contact us by email.

Simply go to the contact section of our website and select the request that best matches your question.



# **Privacy policy**

## **CONFIDENTIALITY POLICY**

Date: 21/05/2018

Protection of your personal data is a priority for us. This confidentiality policy ("Confidentiality Policy") applies to our websites and mobile application (the "Site"). It allows us to inform you about how we use and protect your data.

In the Confidentiality Policy, the term "Personal Data" or "Data" means any information which identifies you directly or indirectly, including through the device you are using, i.e. your computer, tablet, smartphone etc.

By using our Site, you acknowledge that you are aware of our Confidentiality Policy. If we change the way in which we process your data, we will update the Confidentiality Policy and you will be informed by email and/or on your next visit to the Site.

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## 1. Data Controller and Data Protection Officer

Showroomprive.co.uk, a subsidiary of SRP GROUPE and a SARL (French limited liability company) with share capital of €120,169,260, which has its registered office in the urban development zone of ZAC de la Montjoie - 1 Rue des Blés – 93210 La Plaine Saint-Denis, France, and is registered on the Bobigny Trade and Companies Register as number 538 811 837 ("Showroomprive.com" or "we"), controls your Personal Data, under the terms and conditions set out in this policy.

Showroomprive.com has a data protection officer and a "Privacy" unit which can be contacted by email at the following address: privacy@showroomprive.net or by post to Cellule Privacy, ZAC de la Montjoie – 1 Rue des Blés – 93210 La Plaine Saint-Denis.

# 2. What Data we collect and when

When you use our Site and our services, we may collect the following Data about you:

- surname, first name;
- postal address:
- email address;
- IP address;
- password;
- records of orders and transaction numbers;
- records of visits to the Site and browsing history;
- bank card details (through our payment management providers and under the terms set out in section 8 below).

If you connect to the Site through Facebook, we will also have access to your public profile and, depending on the Facebook options you have chosen, to the email address registered with Facebook.

Other data may also be collected automatically when you browse the Site. The list of the relevant categories of Data is included in <u>section 10 on Cookies</u>.

The Data mentioned above may be collected on a number of different occasions:

- when you create your account on the Site or link to the Site through Facebook;
- when you place your orders;
- when you browse the Site;
- when you take part in a game or competition we have organised;
- when you contact our customer service department.

## 3. How we use your Data and the relevant legislation

We process your Data for the following purposes:

- to manage your orders (e.g. deliveries, management of complaints, after-sales service or disputes), in performance of the contract of sale you agree with us when you buy an item on our Site;
- to make you aware of commercial offers on the basis of our legitimate interest in ensuring that you benefit from an optimal experience of our Site;
- to personalise the messages and offers we send you, based on your web browsing history and your previous purchases, with your prior consent;
- to make you aware of offers from our partners, with your prior consent;
- -to draw up commercial statistics and analyse our marketing tools (e.g. to count the number of displays and activations of our sales spaces and draw up statistics on visitors to different parts of the Site), on the basis of our legitimate interest in ensuring that we can understand and improve the performance of our Site;
- to take action against fraud (e.g. implementation of security measures including in particular action against bank card fraud), on the basis of our legitimate interest in ensuring the security of transactions taking place on our Site, under the terms set out in section 8-2 below.

## 4. How long we keep your Data

With the exception of the specific provisions on bank card details and action against fraud in section 8 below, your Personal Data are stored in our active database for at most three years after your last activity, this corresponds to:

- your last purchase;
- your last visit to our Site, provided that you connect to your account and browse the Site pages;
- the last contact you make with our customer service department;

- use of a link in a newsletter or other marketing email we send you (with your consent).

Few weeks before the end of this period, we will contact you to ask if you wish to keep your account. If not, or if you do not reply, we will close your account and delete your Data from our active database. You will then no longer be able to connect to your account with your previous login details and so will have to create a new account..

After deletion of your data from our active database, they will be temporarily archived to meet our legal, accounting and tax obligations, and so that we can manage any complaints, within the relevant time limits. If your Data are subsequently archived, they will automatically be irreversibly anonymised.

Under all circumstances and in accordance with section 7 below, you may at any time ask for the deletion of all or some of your Data, object to their processing or ask for it to be restricted.

# 5. Who may receive your Personal Data

Other than Showroomprivé.co.uk, your Data may also be sent to the following recipients:

- Our service providers, who assist us in delivering our services to you by undertaking, under our control, all or some of the processing of your Data. They are:
- Our web hosting service, based in Marseille, which stores all your Data for us;
- The service providers responsible for the management and security of the payments you make on our Site;
- The service providers who prepare and deliver our items;
- The service providers who deliver our advertising, marketing and sales campaigns;
- Some parts of the SRP group, to enable us to comply with our legal obligations, prevent fraud and ensure our tools are secure.
- Our commercial partners where the service to which you have subscribed has been cocreated by us and our partner. Both of us will process your Data.

We may also share all or some of your Data with a third party, where:

- You have given prior consent;
- We are required to do so by the law, by order of a public authority or in connection with legal proceedings;
- We assign or transfer all or part of our business or our assets, for example, as part of a merger or sale. Transactions of this kind may legitimately involve prior audits by professionals, requiring the implementation of appropriate guarantees and security measures, in order to ensure that the confidentiality of the data to which they have access is respected. In the event that a transfer or assignment of our assets containing your Data is actually carried out, we will implement information procedures enabling us to ensure that you can exercise your rights over your Data.

#### 6. Transfer of Data outside the European Union

Your Data may pass through or be stored on servers belonging to us or our partners. As an example, Data collected by our customer service department may be transferred to service providers located outside the European Union. These servers may be located anywhere in the world, in countries with levels of legal protection different from ours. However, we undertake to take all necessary measures to maintain an appropriate level of security and confidentiality. We may for example require our subcontractors and partners to implement all measures necessary to ensure the same level of protection as that required by legislation applicable to personal data.

# 7. Your rights and how to exercise them

Under the legislation applicable to personal data, you may exercise the following rights as regards Showroomprivé.co.uk:

- Access your data, and ask for its rectification, deletion or portability;

- Withdraw your consent for the future, for all or some of the processing in question;
- Object to the processing of your Data, or ask for it to be restricted;

You may exercise these rights by completing our <u>online form</u>, by sending an email to customerservice.en@showroomprive.com or by post to the following address: Showroomprive.com 1, Rue des Blés 93210 La Plaine Saint Denis, providing evidence of your identity and specifying:

- Your surname, first name and email address;
- The subject of your request;
- The address for the reply;

We will respond within one month maximum upon receipt of your request. You also have the right to complain to a supervisory authority.

#### 8. Security and confidentiality of payments

It is very important to us that your purchases should be made under the best possible security conditions. Your transactions are therefore kept confidential, encrypted and protected through the SSL (Secure Sockets Layer) protocol. When you pay for your order by bank card, the transaction is between you and the ADYEN group, both well known for their reliability regarding internet transactions.

We take a number of measures to combat fraud:

- When you click on "Confirm" when completing your order, our bank checks the number of the card and that it has not been blocked.
- We also use a programme called "3D Secure" for the purpose of preventing fraud. At the time of online payment, you may therefore be asked to identify yourself before the transaction is completed (by means of a link to your bank's website, and receipt of an SMS or identification questions, such as date of birth, post code, etc.).
- Finally, we have introduced automatic processes to combat bank card fraud. We may therefore undertake checks on the accuracy of your identity and home address. For this purpose, we may check the information you provide to us (such as your surname, first name, email address, delivery address etc.), the IP address used and the record of your previous orders and transactions; the features of the order in question, and the bank card used (type, country of issue, partial numbers sent by the banks and payment organisations, comprising only the first four and last two digits, and expiry date). Where necessary, we may ask you to email us a copy of your identity document and proof of address dated within the last three (3) months. These documents will be kept only as long as is necessary to carry out the checks and will not be passed on to third parties. We reserve the right to cancel the order in question and block the account. In the event that we do not receive the evidence requested by the deadline, we will cancel your order but we will not block your account. You will be informed of this by email.

In relation to these processes, you are reminded that you have all the rights listed in sections 1 - 6 above.

We do not keep your bank details on our servers. For every order, you should therefore enter them in the fields provided when placing the order for your purchases. However, and only if you confirm your consent, your bank details may be kept securely by the payment providers selected by Showroomprive.com so they can be used for future payments on the Site. To do this, you simply tick the box "Remember my details" when paying.

You can ask at any time for a registered bank card to be deleted:

- By going to "My personal details", then "My saved cards", and clicking on the x, or
- By sending us an email at the following address: customerservice.payment.en@showroomprive.com

#### 9. Social media

Like most of you, we are present on a number of social media platforms, including Facebook. You can link to them through our Site at a number of points:

- When you connect to our site through your Facebook page. As noted at section 2 above, we will then have access to your public profile and, depending on the Facebook options you have chosen, the email address registered with Facebook. However, we will never disclose anything about your Facebook profile;

- When you share our sales on social media.

Each social media network has its own confidentiality policy. You are invited to make yourself aware of these.

#### 10. Cookies

The term "Cookie(s)" means a file downloaded and read when a website is visited, an email is read, or a software package or a mobile application is installed and used, regardless of the type of device used.

Several types of Cookies are installed on the Site, for a range of purposes. To set up and/or change your Cookie settings, go to your account.

You can enable or disable Cookies as explained below. Note that the settings will be activated within 24 hours of your request. Your Cookies will last for 13 months.

You can manage the ways we store and use Data collected through Cookies at any time.

How to manage the use of cookies through your web browser

The different ways to manage your Cookies depending on your web browser are listed below. The settings for each browser are described in its help menu. Some examples:

• For Internet Explorer™: <a href="http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies">http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies</a>

In the Internet Explorer menu, go to "Internet Options";

Under the "Confidentiality" tab, click on "Advanced";

Tick the box "override automatic cookie handling";

Then select: "Accept" for internal cookies and "Refuse" for third party cookies;

Save the changes by clicking on "OK".

• For Safari™: http://docs.info.apple.com/article.htlm?path=Safari/3.0/fr/9277.htlm

In the Safari menu, select "Preferences";

Go to the "Security" tab;

Under the "Accept cookies" option, select "Only from sites I visit".

• For **Chrome**™: <a href="http://support.google.com/chrome/bin/answer.py?">http://support.google.com/chrome/bin/answer.py?</a>
<a href="http://support.google.com/chrome/bin/answer.py?">http://support.google.com/chrome/bin/answer.py?</a>

In the Chrome menu, select "Settings"

Click on "Display advanced settings"

Go to the "Privacy" section

Click on the "Content settings" tab

In the Cookies section (at the top) tick the box "Block third-party cookies and data"

Save the changes by clicking on "OK".

#### • For **Firefox**™:

http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies

On the Firefox home page, click on "Settings"

Select the "Privacy and Security" section

In the "History" menu, select the "Use custom settings for history" option

*In the "Accept third party cookies" menu, select "Never"* 

Save the changes by clicking on "OK".

For other browsers and mobile devices, we invite you to go to the relevant official website of the browser or manufacturer or consult the documentation provided.

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