

# Privacy notice

Last updated: 20 March 2019

www.adventure-street.co.uk ('Website') is provided by Adventure Street Ltd ('we'/'us'/'our'). In doing so, we may be in a position to receive and process personal information relating to you. As the controller of this information, we're providing this Privacy Notice ('Notice') to explain our approach to personal information. This Notice forms part of our Website Terms and Conditions, which governs the use of this Website.

We intend only to process personal information fairly and transparently as required by data protection law including the General Data Protection Regulation (GDPR). In particular, before obtaining information from you (including through use of cookies) we intend to alert you to this Notice, let you know how we intend to process the information (including through use of cookies) and (unless processing is necessary for at least one of the 5 reasons outlined in clause 2 below) we'll only process the information if you consent to that processing. The GDPR also defines certain 'special categories' of personal information that's considered more sensitive. We do not process 'Special Categories' of information.

Of course, you may browse parts of this Website without providing any information about yourself and without accepting cookies. In that case, it's unlikely we'll possess and process any information relating to you.

## 1. Identity and contact details

- 1.1 Registered number: 11641383, Registered office: 23 Bilston Street, Dudley, West Midlands, DY3 1JA, [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk), Our Data Protection Officer (DPO), Director Emma Postance, would welcome communication from you regarding any matter relating to data protection, and can be contacted by email at [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk).

## 2. When we're allowed to collect information from you

We will only collect personal information relating to you if one of the following conditions have been satisfied:

- 2.1 You have clearly told us that you are content for us to collect that information for the certain purpose or purposes that we will have specified.
- 2.2 The processing is necessary for the performance a contract that we have with you.
- 2.3 The processing is necessary so that we can comply with the law.
- 2.4 The processing is necessary to protect someone's life.
- 2.5 The processing is necessary for performance of a task that's in the public interest.
- 2.6 The processing is necessary for our or another's legitimate interest - but in this case, we'll balance those interests against your interests.

## 3. How to consent

- 3.1 At the point of collecting the information, we'll endeavour to explain how we intend to use the information and which of these purposes apply.
- 3.2 If at any point in time you change your mind and decide that you don't consent, please let us know and we'll endeavour to stop processing your information in the specified manner, or we'll delete your data if there is no continuing reason for possessing it.
- 3.3 If you don't consent to a particular bit of processing, we'll endeavour to ensure that the Website and our service continue to operate without the need for that information.

## 4. Information we expect to collect from you

- 4.1 We envisage asking for the following types of information from you:

Information type	Purpose and related details	Justification
------------------	-----------------------------	---------------

Name, address and contact details	<ul style="list-style-type: none"> <li>We ask for this to enable us to process your order, and to pass on to payment companies so they can process your payment option efficiently.</li> <li>We intend to share this data with Commercial payment providers as they are unable to process you payment without the data.. They will be processing the data for purposes that they determine.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for the performance of a contract with you. We believe using highly reputable 3<sup>rd</sup> party payment providers gives you the best level of security for online transactions.</li> </ul>
Your computer IP address	<ul style="list-style-type: none"> <li>We collect this as part of our security process to protect us from fraudulent transactions.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary for our legitimate interest as part of our website security function</li> </ul>
Name of children	<ul style="list-style-type: none"> <li>We may for specific provision of tailored goods or services ask you to provide us the name of a child.</li> </ul>	<ul style="list-style-type: none"> <li>Its necessary for us to provide the services when they are tailored specifically to your child.</li> </ul>

4.2 We may collect personal information about you from a number of sources, including the following:

- 4.2.1 From you when you agree to take a service or product from us, in which case this may include your contact details and occasionally your childs name.
- 4.2.2 From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
- 4.2.3 From documents that are available to the public, such as the electoral register or social media.
- 4.2.4 From third party payment providers who you provide details to in order to pay specifically for our services. This data will only be enough to confirm payment completion and never enough for us to replicate the transaction ourselves.

4.3 If you refuse to provide information requested, then if that information is necessary for a service we provide to you we may need to stop providing that service.

## 5. Using your personal information

5.1 Data protection, privacy and security are important to us, and we shall only use your personal information for specified purposes and shall not keep such personal information longer than is necessary to fulfil these purposes. The following are examples of such purposes. We have also indicated below which GDPR justification applies, however it will depend on the circumstances of each case. At the time of collecting we will provide further information, and you may always ask for further information from us.

- 5.1.1 To help us to identify you when you contact us. This will normally be necessary for the performance our contract.
- 5.1.2 To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future. This will often be necessary, but sometimes the improvements will not be necessary in which case we will ask whether you agree.
- 5.1.3 To allow us to carry out marketing analysis and customer profiling. We will only do this with anonymised data.
- 5.1.4 To help to prevent and detect fraud or loss. This will only be done in certain circumstances when we consider it necessary or the law requires it.
- 5.1.5 To allow us to contact you by written electronic means (such as email, text or multimedia messages) about products and services offered by us where:
  - 5.1.5.1 these products are similar to those you have already purchased from us,
  - 5.1.5.2 you were given the opportunity to opt out of being contacted by us at the time your personal information was originally collected by us and at the time of our subsequent communications with you, and
  - 5.1.5.3 you have not opted out of us contacting you.

- 5.1.6 We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
  - 5.1.6.1 Before doing that, we will always tell you of our intentions and of the specific purpose in making the recording. Sometimes such recordings will be necessary to comply with the law. Alternatively, sometimes the recording will be necessary for our legitimate interest, but in that case we'll only record the call if our interest outweighs yours. This will depend on all the circumstances, in particular the importance of the information and whether we can obtain the information another way that's less intrusive.
  - 5.1.6.2 If we think the recording would be useful for us but that it's not necessary we'll ask whether you consent to the recording, and will provide an option for you to tell us that you consent. In those situations, if you don't consent, the call will either automatically end or will not be recorded.
- 5.1.7 When it's required by law, we'll check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we intend to record this.
- 5.2 We will not disclose your personal information to any third party except in accordance with this Notice, and in particular in these circumstances:
  - 5.2.1 They will be processing the data on our behalf as a data processor (where we'll be the data controller). In that situation, we'll always have a contract with the data processor as set out in the GDPR. This contract provides significant restrictions as to how the data processor operates so that you can be confident your data is protected to the same degree as provided in this Notice.
  - 5.2.2 Sometimes it might be necessary to share data with another data controller. Before doing that we'll always tell you. Note that if we receive information about you from a third party, then as soon as reasonably practicable afterwards we'll let you know; that's required by the GDPR.
- 5.3 We may allow other people and organisations to use personal information we hold about you in the following circumstances:
  - 5.3.1 If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case personal information held by us, about our customers, will be one of the transferred assets.
  - 5.3.2 If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
  - 5.3.3 We may employ companies and individuals to perform functions on our behalf and we may disclose your personal information to these parties for the purposes set out above, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. Those parties will be bound by strict contractual provisions with us and will only have access to personal information needed to perform their functions, and they may not use it for any other purpose. Further, they must process the personal information in accordance with this Notice and as permitted by the GDPR. From time to time, these other people and organisations to whom we may pass your personal information may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Notice and the GDPR.

## 6. Protecting information

- 6.1 We have strict security measures to protect personal information. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software to encrypt information you input.
- 6.2 We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

- 6.3 It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

## 7. The internet

- 7.1 Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

## 8. Cookies and other internet tracking technology

9. When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'.<sup>[1]</sup> These cookies cannot be used to identify you personally and are used to improve services for you, for example through:

- Letting you navigate between pages efficiently
- Enabling a service to recognise your computer so you don't have to give the same information during one task
- Recognising that you have already given a username and password so you don't need to enter it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

To learn more about cookies, see:

- [www.allaboutcookies.org](http://www.allaboutcookies.org)
- [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- [www.google.com/policies/technologies/cookies/](http://www.google.com/policies/technologies/cookies/)

Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these options, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer.

Multiple cookies may be found in a single file depending on which browser you use. The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide, as follows:

### *Category 1: strictly necessary cookies*<sup>[1]</sup>

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

### *Category 2: performance cookies*<sup>[1]</sup>

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

### *Category 3: functionality cookies*<sup>[1]</sup>

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

## 10. Further information

- 10.1 If you would like any more information or you have any comments about this Notice, please write to our Data Protection Officer as detailed in clause 1.1.
- 10.2 Please note that we may have to amend this Notice on occasion, for example if we change the cookies that we use. If we do that, we will publish the amended version on the Website. In that situation we will endeavour to alert you to the change, but it's also your responsibility to check regularly to determine whether this Notice has changed.
- 10.3 You can ask us for a copy of this Notice by writing to the above address or by emailing us at [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk). This Notice applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 10.4 If you would like access to the personal information that we hold about you, you can do this by emailing us at [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk) or writing to us at the address noted above. There is not normally a fee for such a request, however if the request is unfounded, repetitive or excessive we may request a fee or refuse to comply with your request. You can also ask us to send the personal information we hold about you to another controller.
- 10.5 We aim to keep the personal information we hold about you accurate and up to date. If you tell us that we're holding any inaccurate or incomplete personal information about you, we will promptly amend, complete or delete it accordingly. Please email us at [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk) or write to us at the address above to update your personal information. You have the right to complain to the Information Commissioner's Office if we don't do this.
- 10.6 You can ask us to delete the personal information that we hold about you if we relied on your consent in holding that information or if it's no longer necessary. You can also restrict or object to our processing of your personal information in certain circumstances. You can do this by emailing us at [hello@adventure-street.co.uk](mailto:hello@adventure-street.co.uk) or writing to us at the address noted above.
- 10.7 We will tell you if there is a breach, or a likely breach, of your data protection rights.