

# PRIVACY POLICY



## **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## **2. Credit**

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

## **3. Collecting personal information**

- 3.1 We may collect, store and use the following kinds of personal information:
  - (a) Information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths).
  - (b) Information that you provide to us when registering with our website and completing our contact form, including your name, telephone number and email address, as well as any metadata associated with the communication and any other personal information that you choose to send us.
  - (c) Information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)
  - (d) Information relating to any purchases you make of our services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details).
- 3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## **4. Using personal information**

- 4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 4.2 We may use your personal information to:
  - (a) Administer our website and business.
  - (b) Supply to you services purchased through our website.
  - (c) Send statements, invoices and payment reminders to you, and collect payments from you.
  - (d) Send you non-marketing commercial communications.
  - (e) Send you email notifications that you have specifically requested.
  - (f) Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter).
  - (g) Send you marketing communications relating to our business or the businesses of carefully-selected third parties, which we think may be of interest to you, by email or similar technology (you can inform us at any time if you no longer require marketing communications).
  - (h) Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information).

- (i) Deal with enquiries and complaints made by or about you relating to our website.
  - (j) Keep our website secure and prevent fraud.
  - (k) Verify compliance with the terms and conditions governing the use of our website.
- 4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.
- 4.4 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.
- 4.5 All our website financial transactions are handled through our payment services provider, SagePay and Braintree. You can review the provider's privacy policies at <https://www.sagepay.co.uk/policies/privacy-policy> & <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

## **5. Disclosing personal information**

- 5.1 We may disclose your personal information to; any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 5.3 We may disclose your personal information:
- (a) to the extent that we are required to do so by law.
  - (b) in connection with any ongoing or prospective legal proceedings.
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
  - (d) To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.
  - (e) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 5.4 Except as provided in this policy, we will not provide your personal information to third parties.

## **6. International data transfers**

- 6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we, or our third parties or suppliers operate in order to enable us to use the information in accordance with this policy.
- 6.2 Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area (these include, but are not limited to: the United States of America, Russia, Japan, China, India, and Vietnam).
- 6.3 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 6.4 You expressly agree to the transfers of personal information described in this Section 6.

## **7. Retaining personal information**

- 7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than 7 years, or than is necessary for that purpose or those purposes.
- 7.3 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **8. Security of personal information**

- 8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 8.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 8.5 You are responsible for keeping the password you use for accessing our website confidential.

## **9. Amendments**

- 9.1 We may update this policy from time to time by publishing a new version on our website.
- 9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **10. Your rights**

- 10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 10.2 We may withhold personal information that you request to the extent permitted by law.
- 10.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 10.4 We will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **11. Third party websites**

- 11.1 Our website includes hyperlinks to, and details of, third party websites.
- 11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **12. Updating information**

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

### 13. Cookies

13.1 Our website uses cookies.

13.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

13.5 We use both session and persistent cookies on our website.

13.6 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

Cookie Name	Cookie Description
CART	The association with your shopping cart.
CATEGORY_INFO	Stores the category info on the page, that allows to display pages more quickly.
COMPARE	The items that you have in the Compare Products list.
CURRENCY	Your preferred currency
CUSTOMER	An encrypted version of your customer id with the store.
CUSTOMER_AUTH	An indicator if you are currently logged into the store.
CUSTOMER_INFO	An encrypted version of the customer group you belong to.
CUSTOMER_SEGMENT_IDS	Stores the Customer Segment ID
EXTERNAL_NO_CACHE	A flag, which indicates whether caching is disabled or not.
FRONTEND	Your session ID on the server.
GUEST-VIEW	Allows guests to edit their orders.
LAST_CATEGORY	The last category you visited.
LAST_PRODUCT	The most recent product you have viewed.
NEWMESSAGE	Indicates whether a new message has been received.
NO_CACHE	Indicates whether it is allowed to use cache.
PERSISTENT_SHOPPING_CART	A link to information about your cart and viewing history if you have asked the site.
POLL	The ID of any polls you have recently voted in.
POLLN	Information on what polls you have voted on.

RECENTLYCOMPARED	The items that you have recently compared.
STF	Information on products you have emailed to friends.
STORE	The store view or language you have selected.
USER_ALLOWED_SAVE_COOKIE	Indicates whether a customer allowed to use cookies.
VIEWED_PRODUCT_IDS	The products that you have recently viewed.
WISHLIST	An encrypted list of products added to your Wishlist.
WISHLIST_CNT	The number of items in your Wishlist.
GOOGLE_ANALYTICS_utma	Enables the use of the Google web stats service to store anonymous data on your visit.
GOOGLE_ANALYTICS_utmb	Enables the use of the Google web stats service to store anonymous data on your visit.
GOOGLE_ANALYTICS_utmc	Enables the use of the Google web stats service to store anonymous data on your visit.
GOOGLE_ANALYTICS_utmz	Enables the use of the Google web stats service to store anonymous data on your visit.

13.7 Most browsers allow you to refuse to accept cookies; for example:

- (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- (b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

13.8 Blocking all cookies will have a negative impact upon the usability of many websites.

13.9 If you block cookies, you will not be able to use all the features on our website.

13.10 You can delete cookies already stored on your computer; for example:

- (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie-ie-11>);
- (b) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- (c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

13.11 Deleting cookies will have a negative impact on the usability of many websites.

#### 14. Data protection registration

14.1 We are registered as a data controller with the UK Information Commissioner's Office.

14.2 Our data protection registration number is ZA11B425.

**15. Our details**

15.1 This website is owned and operated by 7am Limited T/A Media Lounge

15.2 We are registered in England and Wales under registration number 06801560, and our registered office is at 8-10 Christchurch Road, Bournemouth, BH1 3NA.

15.3 Our principal place of business is at our registered office address, 8-10 Christchurch Road, Bournemouth, BH1 3NA.

15.4 You can contact us:

(a) By Email: [enquiries@medialounge.co.uk](mailto:enquiries@medialounge.co.uk).

(b) Using our website contact form.

(c) By telephone, on 01202 237 370