

Stubben Edge Privacy Notice for platform users

This Privacy Notice was last updated on 30th January 2020.

What is the purpose of this document?

Stubben Edge Group Limited (trading as Stubben Edge) is committed to protecting the privacy and security of your personal information.

We operate the Stubben Edge [loyalty reward] platform which gives users access to discounts and offers from third party service providers.

This privacy notice describes how we collect and use personal information about you during and after your use of the platform, in accordance with the General Data Protection Regulation (**GDPR**).

This privacy notice applies to all users who use our platform.

Stubben Edge Group Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. Our Information Commissioner's Office registration number is ZA330890.

We are a company registered in England and Wales under company registration number 07227141. Our registered office address is at Seventh Floor, 75-77 Cornhill, London, England, EC3V 3QQ. You can contact us by writing to us at that address. Alternatively, you can call us on 0207 8461 378 or email us at hello@stubbenedge.com.

This notice applies to all users of our platform. We may update this notice at any time but if we do so, we will let you know as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.

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5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, racial or ethnic origin or criminal convictions.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as title, first names, surname, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Username and password details.
- Information about your use of our platform including (but not limited to) any location or category preferences you have subscribed to in relation to the discounts and offers available on our platform.
- your Internet Protocol (IP) address, browser type, browser version, the pages of our platform that you visit, the time and date of your visit to our platform, the time spent on the pages you visit, your unique device identifiers and other diagnostic data.

We do not collect, store or use any sensitive personal data about you such as personal data about your health, racial or ethnic origin or criminal convictions.

How is your personal information collected?

We collect personal information about you through your use of the platform such as when you create a user account on the platform.

We will collect additional personal information during your use of our platform and services such as information about the preferences you set within our platform and the types of benefits you click on through our platform.

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How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have with you under which we provide you with access to our platform and services.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
4. Where we have your consent to contact you about the discounts and offers available on our platform.

We may also use your personal information where we need to protect your interests (or someone else's interests), although that is likely to be rare.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to properly provide our platform and services to you and to enable us to comply with legal obligations. We may also use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information, and the lawful basis for the processing, are listed in the table below.

Situations in which we process personal data	Lawful basis for processing
To allow you to set up your user account and to access and make use of our platform and services.	Performance of our contract with you.
To provide you with location based features such as location-based offers and discounts.	Consent.
To provide you with support in using our platform.	Performance of our contract with you.
To investigate misconduct or suspected misconduct and to deal with complaints.	Our legitimate interests to ensure the proper operation of our business.

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<p>To monitor your use of our platform to ensure compliance with our rules, policies and procedures.</p>	<p>Our legitimate interests to ensure the proper operation of our business.</p>
<p>For our business management and planning, including accounting and auditing.</p>	<p>Our legitimate interests to ensure the proper operation of our business.</p>
<p>To make decisions about your continued use of our platform and services.</p>	<p>Our legitimate interests to ensure the proper operation of our business.</p>
<p>To keep the platform safe and secure</p>	<p>To comply with our legal obligations.</p> <p>Our legitimate interests to ensure the proper operation of the platform and business.</p>
<p>To prevent fraud.</p>	<p>To comply with our legal obligations.</p> <p>Our legitimate interests to protect our business from fraud.</p>
<p>To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.</p>	<p>Our legitimate interests to ensure the security of our systems.</p>
<p>To detect, prevent and address technical issues.</p>	<p>Our legitimate interests to ensure the proper operation of our business.</p>
<p>To improve our platform and services.</p>	<p>Our legitimate interests to ensure the continued improvement of our business.</p>
<p>To ensure that content on the platform is presented in the most effective and relevant manner for you and for your device and to tailor the platform's experience and content based on the way that you use the platform.</p>	<p>Our legitimate interests to ensure the continued improvement of our business.</p>

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To conduct data analytics studies to review and better understand use of our platform.	Our legitimate interests to ensure the continued improvement of our business.
Where you have given your consent, to provide you with newsletters and marketing and promotional materials and other information that may be of interest to you.	Consent.
To notify you about changes to our platform and services.	Performance of our contract with you. Our legitimate interests to ensure you are aware of changes to our platform and services.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to provide the platform to you, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We will share your data with third parties, including third party service providers and other entities in our group.

In the event of a complaint or a dispute, we may share your data with the broker or other organisation who asked us to grant you access to the platform or with the

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relevant retailers for the purposes of dealing with your complaint or dispute.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We will transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

We will create aggregate and anonymous data from your personal information and from the personal information we collect from other users of the platform. We will use the aggregate and anonymous data for our own commercial purposes and we may share it with other businesses. You will not be identifiable from the data.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or in order for a third-party service provider to provide a service related to your use of our platform and services.

Which third parties process my personal information?

"Third parties" include the broker or other organisation who asked us to grant you access to the platform, the retailers you deal with via our platform, our third party service providers (including our contractors and designated agents) and other entities within our group.

We will share your personal information with our service providers including those providing payroll, administration, IT services and analytics services.

How secure is my information with third parties?

All our clients, service providers and other entities within our group are required to take appropriate security measures to protect your personal information. They must only process your personal data for specified permitted purposes and in accordance with data protection law.

When might you share my personal information with other entities in the group?

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of our business. In this situation we will, so

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far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may need to share your personal information with a regulator or to otherwise comply with the law.

We may need to share your personal information with our professional advisors, the authorities and the courts in certain situations (for example, to enforce our legal rights or to defend ourselves against allegations or claims made against us, to prevent or investigate wrongdoings or suspected wrongdoings or to protect and safeguard the users who use our platform and services).

Transferring information outside the EU

We use third parties to host our data. As part of the data hosting, the personal information we collect about you will be stored outside the EU.

However, to ensure that your personal information does receive an adequate level of protection we will make sure that we take steps necessary to protect your data as required by applicable laws. For instance, we may put in place the EU Commission's approved Model Contractual Clauses or equivalent level protections to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Our third-party service providers will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to access your personal information. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

However, you should be aware that the transmission of information and data is never completely secure and there is a measure of risk associated with the use of any online service.

Data retention

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How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your use of the platform. You can update your personal information in your account settings via our platform.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

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- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Mikas@stubbenedge.com in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Mikas@stubbenedge.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

The withdrawal of your consent will not affect the lawfulness of any processing carried out before your consent was withdrawn.

Use of cookies

We use cookies and similar tracking technologies to track the activity on our platform and we hold certain information collected via cookies. For information about our use of cookies please refer to our cookies policy which is available at <https://www.stubbenedge.com/cookie-policy/>

Links to other sites

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Our platform may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies or practices of any third party sites or services.

Data privacy manager

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

You should review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If you have any questions about this privacy notice, please contact our data privacy manager using the following contact details:

Mika Sa Nobrega
mikas@stubbenedge.com
0207 8461 380