

## **Privacy Policy of Finling Associates Ltd**

**Finling Associates Ltd** ("We") is committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.finling.co.uk](http://www.finling.co.uk) ("**our site**") you are accepting and consenting to the practices described in this policy.

We are registered as Data Controller, Registration Number Z3554937, in accordance with the Data Protection Act 1998 (the "**Act**").

For the purpose of the Act, the data controller is Finling Associates Ltd of Unit 2, Printer's Yard, 90A The Broadway, London SW19 1RD.

### **Information we may collect from you**

We may collect and process the following data about you:

#### **Information you give us:**

- Information that you provide by filling in forms on our site. This includes information provided at the time of registering to use our site, subscribing to our service, entering a competition or promotion, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Information you may give us may include your name, address, email address and phone number, financial and credit card information, personal description and photograph.

#### **Information we collect about you:**

- Details of transactions you carry out through our site, including information forms, invoicing and of the fulfilment of your orders.
- Details of your visits to our site and the resources that you access, including the full Uniform Resource Locators (URL) clickstream to, through and from our site, products you viewed or searched for, page response times, download errors, length of visits to certain pages and page interaction information.
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

**Information we receive from other sources:**

- We may receive information about you if you use any of the services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

**Cookies**

We may obtain information about your general internet usage by using cookie files which are stored on the hard drive of your computer. These cookies collect information, and are then sent back to the originating website on each subsequent visit. They help us to improve our site and to deliver a better and more personalised service. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

**Where we store your personal data**

The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or you have chosen) a password which enables you to access certain points of our site, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**Uses made of the information**

We use information held about you in the following ways:

**Information you give us:** We will use this information:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

If you are an existing customer, we will only contact you by electronic means (such as e-mail) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, we will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way please tick the relevant box situated on the form on which we collect your data.

**Information we collect about you:** We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- As part of our efforts to keep our site safe and secure.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

**Information we receive from other sources:** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**Disclosure of your information:** We may disclose your personal information to third parties, including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you, or for the purpose of verifying your identity for anti-money laundering purposes.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If our business or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply and other agreements; or to protect the rights, property, or safety of our business, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Your Rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at: Unit 2, Printer's Yard, 90A The Broadway, London SW19 1RD.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. **If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.**

## **Access to information**

The Data Protection Act gives you the right to access information held about you. Your right of access can be exercised in accordance with this Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: The Operations Manager, Finling Associates Ltd, Unit 2, Printer's Yard, 90A The Broadway, London SW19 1RD