

# Selazar Data Privacy Notice

Welcome to Selazar Limited's ("Selazar") privacy notice.

## Who We Are

Selazar specialise in eCommerce operations. Our registered office is Kemp House, 152 - 160 City Road, London, EC1V 2NX.

## 1. Important information

At Selazar we take your privacy seriously and we are committed to protecting your personal data. We aim to be clear about how we use personal data and this privacy notice will inform you as to how we look after your personal data, what personal data we process and why. It applies both when you visit our website (regardless of where you visit it from) and when you use our services. It also applies when retailers who you have purchased goods from share your personal data with us.

Our website is not intended for children and we do not knowingly collect data relating to children.

You should read this privacy policy carefully together with our [Terms and Conditions](#).

We keep this privacy policy under regular review. We may update this privacy policy from time to time and will do our best to draw your attention to any change which are made.

## Controller and Processor

Selazar is both a controller and a processor in relation to personal data. We are a controller in respect of individuals interacting with our business such as customers, suppliers, visitors to our website and prospective customers; Selazar is also a processor in respect of our own data and that of our clients' customers whose data we receive from our clients to perform our eCommerce operations.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. Where you can contact us if you have any questions about how your personal data is processed by us

We have appointed a Data Supervisory Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Supervisory Officer via email. The email address is [data.protection@selazar.com](mailto:data.protection@selazar.com)

## 3. What types of personal data we process, where we get that personal data from

As part of our services, we may need to collect use, store and transfer different kinds of personal data which we have grouped together follows:

- **Identity Data** includes name, title.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Transaction Data** includes details about payments and other details of services purchased from us.
- **Technical Data** includes internet protocol (IP) address and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.

We also collect, use and share **Aggregated Data** such as statistical data for any purpose.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) unless we have your explicit consent to do so. Nor do we collect any information about criminal convictions and offences.

#### How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** Some of this information may be supplied directly from retailers via the e Selazar E-Fulfilment Platform as they use our services to organise delivery of the goods to you. Where you are a retailer passing us the personal data of your customers for us to help deliver their parcels to them, you confirm that you have sufficient legal grounds for collecting and sharing such personal data with us for the purposes envisaged by your customers and us in performing the delivery services and that you process, have processed and will process the personal data that is shared with us in compliance with GDPR and all other similar applicable national laws in relation to data privacy and security.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your browsing actions. We collect this personal data by using cookies.

#### 4. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please contact us ([data.protection@selazar.com](mailto:data.protection@selazar.com)) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract (b) Necessary for our legitimate interests
To process and deliver your	(a) Identity	(a) Performance of a contract

orders including:  (a) manage payments, fees and charges  (b) collect and recover money owed to us  (c) to deliver your order which may be done by a third party courier company	(b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications	(b) Necessary for our legitimate interests
To manage our relationship with you	(a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications	(a) Performance of a contract  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity  (b) Contact  (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Selazar for marketing purposes. We may share your personal data with third party courier companies but these will only use your personal data to fulfil your order.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us (data.protection@selazar.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

### **Change of purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. (data.protection@selazar.com)

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Who we disclose your personal data to and why**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **5. International transfers**

We may transfer your personal data outside of the European Economic Area. If we do transfer such data, please note that we will ensure an appropriate transfer mechanism is used.

## **6. How we store your data securely**

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

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

## 7. Data retention

### How long will you use my personal data for?

We will only retain your personal data 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. ([data.protection@selazar.com](mailto:data.protection@selazar.com))

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 8. What rights you have in relation to your personal data and how you can exercise these rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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 ([www.ico.org.uk](http://www.ico.org.uk)). Address: Information Commissioner's Office 3<sup>rd</sup> Floor, 14 Cromac Place, Belfast, BT7 2JB Tel: 028 9027 8757 or 0303 123 1114 Email: [ni@ico.org.uk](mailto:ni@ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact us. ([data.protection@selazar.com](mailto:data.protection@selazar.com))

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Glossary**

## LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us [data.protection@selazar.com](mailto:data.protection@selazar.com).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### External Third Parties

Service providers acting as processors based who provide IT, marketing and system administration services.

Delivery companies.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.

**If you have any queries about our Privacy Policy, please don't hesitate to [contact us](#).**

**[data.protection@selazar.com](mailto:data.protection@selazar.com)**

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