

Blukom Website Privacy notice

We are Blukom SGPS, a company registered in Madeira with company number 517522918 whose registered address is at Rua dos Murças, n.º 15, 2.º andar, Sala H 9000-058 Funchal, Madeira

In this privacy notice we will refer to ourselves as '**we**', '**us**' or '**our**'.

You can get hold of us in any of the following ways:

- (a) by e-mailing us at enquiries@blukomgroup.com; or
- (b) by writing to us at Blukom, 10 London Mews, Tyburnia, London, W2 1HY

We take the privacy, including the security, of personal information we hold about you seriously. This privacy notice is designed to inform you about how we collect personal information about you and how we use that personal information. You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

We have appointed Wayne Pritchard as our Data Protection Officer. You can contact them using the details set out above.

We may issue you with other privacy notices from time to time, including when we collect personal information from you. This privacy notice is intended to supplement these and does not override them.

We may update this privacy notice from time to time. This version was last updated on 29 April 2022.

1. Key Definitions

The key terms that we use throughout this privacy notice are defined below, for ease:

Data Controller: under UK data protection law, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.

Data Processor: a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller. (This might be the hosting of a site containing personal data, for example, or providing an email marketing service that facilitates mass distribution of marketing material to a Data Controller's customer-base.)

Personal Information: in this privacy notice we refer to your personal data as ‘personal information’. ‘Personal information’ means any information from which a living individual can be identified. It does not apply to information which has been anonymised.

Special Information – certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life and sexual orientation and also includes genetic information and biometric information.

2. Details of personal information which we collect and hold about you

2.1 Set out below are the general categories and details of retention periods in relation to those categories (see section 7 below for more details about retention) and in each case the types of personal information which we collect, use and hold about you:

General Category	Types of Personal Data in that category	Retention Periods
Identity Information	This is information relating to your identity such as your name (including any previous names and any titles which you use), gender, marital status and date of birth	12 months
Contact Information	This is information relating to your contact details such as e-mail address, addresses, telephone numbers	12 months
Survey Information	This is information which we have collected from you or which you have provided to us in respect of surveys and feedback.	12 months
Marketing Information	This is information relating to your marketing and communications preferences.	12 months
Website, Device and Technical Information	This is information about your use of our website and technical data which we collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device and other information we receive about your device)	12 months

- 2.2 The types of personal data we collect about you may differ from person to person, depending on who you are and the relationship between us.

3. Details of how and why we use personal information

3.1 We are only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below, but in most cases, we will use your personal information for the following legal reasons:

- (a) **Contract Reason:** this is in order to perform our obligations to you under a contract we have entered into with you;
- (b) **Legitimate Interests Reason:** this is where the use of your personal information is necessary for our (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests.
- (c) **Legal Obligation Reason:** this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
- (d) **Consent Reason:** this is where you have given us your consent to use your personal information for a specific reason or specific reasons.

3.2 Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal reason for processing your personal information, in which case, we will confirm that reason to you.

3.3 We have explained below the different purposes for which we use your personal information and, in each case, the legal reason(s) allowing us to use your personal information. Please also note the following:

- (a) if we use the Legitimate Interests Reason as the legal reason for which we can use your personal information, we have also explained what that legitimate interest is; and
- (b) for some of the purposes we may have listed more than one legal reason on which we can use your personal information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason that we are relying on to use your personal data for that purpose, please contact us using the contact details set out at the start of this privacy notice.

Purpose	Legal Reason(s) for using the personal information
To ensure the smooth running and correct operation of our website]	Legitimate Interests Reason (to ensure our website runs correctly)
To understand how customers and visitors to our website use the website and interact with it via data analysis]	Legitimate Interests Reason (to improve and grow our business, including our website, and to understand our customer’s needs, desires and requirements)
To enable us to correspond with you and answer your enquiry	Legitimate interests Reason (to answer the enquiry you made through or contact form, phone call or email

3.4 Sometimes we may anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people’s personal information to give us statistical information for our own purposes. Because this is grouped together with other personal information and you are not identifiable from that combined data we are able to use this.

3.5 Under data protection laws we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) which we told you about. If we want to use your personal information for a different purpose which we do not think is compatible with the purpose(s) which we told you about then we will contact you to explain this and what legal reason is in place to allow us to do this.

4. Details of how we collect personal information and special information

4.1 We usually collect Contact Information when you fill out a form, survey or questionnaire, contact us by e-mail, telephone, in writing or otherwise.

4.2 We may receive some of your personal information from third parties or publicly available sources. This includes:

- (a) [Identity Information and Contact Information from publicly available sources such as Companies House.

- (b) [Website, Device and Technical Information from third parties such as analytics providers (like Google).

4.3 We may also receive Website, Device and Technical Information automatically from technologies such as cookies which are installed on our website. To find out more about these please see our cookie policy.

5. Details about who personal Information may be shared with

5.1 We may need to share your personal information with other organisations or people. These organisations include:

- (a) Other companies in our group (who may might act as joint data controllers or as data processors on our behalf) and who may have a legitimate reason to contact you.
- (b) E-mail platforms we use to communicate with our contacts.
- (c) any organisations which propose to purchase our business and assets in which case we may disclose your personal information to the potential purchaser.

5.2 Depending on the circumstances, the organisations or people who we share your personal information with will be acting as either Data Processors or Data Controllers. Where we share your personal information with a Data Processor we will ensure that we have in place contracts, which set out the responsibilities and obligations of us and them, including in respect of security of personal information.

5.3 We do not sell or trade any of the personal information which you have provided to us.

6. Details about transfers to countries outside of the EEA

6.1 If any transfer of personal information by us will mean that your personal information is transferred outside of the EEA then we will ensure that safeguards are in place to ensure that a similar degree of protection is given to your personal information, as is given to it within the EEA and that the transfer is made in compliance with data protection laws (including where relevant any exceptions to the general rules on transferring personal information outside of the EEA which are available to us – these are known as ‘derogations’ under data protection laws). We may need to transfer personal information outside of the EEA [to other organisations within our group or] [to the third parties listed above in section 0 who may be located outside of the EEA.]

6.2 The safeguards set out in data protection laws for transferring personal information outside of the EEA include:

- (a) where the transfer is to a country or territory which the EU Commission has approved as ensuring an adequate level of protection;
- (b) where personal information is transferred to another organisation within our group, under an agreement covering this situation which is known as “binding corporate rules”;
- (c) having in place a standard set of clauses which have been approved by the EU Commission;
- (d) compliance with an approved code of conduct by a relevant data protection supervisory authority (in the UK, this is the Information Commissioner’s Office (**ICO**));
- (e) certification with an approved certification mechanism;
- (f) where the EU Commission has approved specific arrangements in respect of certain countries, such as the US Privacy Shield, in relation to organisations which have signed up to it in the USA.

7. Details about how long we will hold your personal information

7.1 We will only hold your personal data for as long as is necessary. How long is necessary will depend upon the purposes for which we collected the personal information (see section 3 above).

7.2 [We have set out above the details of our retention periods for different types of data. You can find them in in section 2.

8. YOUR RIGHTS UNDER DATA PROTECTION LAW

8.1 Under data protection laws you have certain rights in relation to your personal information, as follows:

- (a) **Right to request access:** (this is often called ‘subject access’). This is the right to obtain from us a copy of the personal information which we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
- (b) **Right to correction:** this is the right to request that any incorrect personal data is corrected and that any incomplete personal data is completed.
- (c) **Right to erasure:** (this is often called the “right to be forgotten”). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.
- (d) **Right to restrict processing:** this right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.

- (e) **Right to data portability:** this right allows you to request us to transfer your personal information to someone else.
- (f) **Right to object:** you have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see section 3 above) and there is something about your particular situation which means that you want to object to us processing your personal information. In certain circumstances you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).

8.2 In addition to the rights set out in section 8.1, where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent. Further details about this are set out in section 3.2.

8.3 If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out at the beginning of this notice. If you do make a request then please note:

- (a) we may need certain information from you so that we can verify your identity;
- (b) we do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
- (c) if your request is unfounded or excessive then we may refuse to deal with your request.

9. Marketing

9.1 You may receive marketing from us where either you have consented to this, or we have another legal reason by which we can contact you for marketing purposes.

9.2 However, we will give you the opportunity to manage how or if we market to you. In any e-mail which we send to you, we provide a link to either unsubscribe or opt-out, or to change your marketing preferences. To change your marketing preferences, and/or to request that we stop processing your personal information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.

9.3 We do not pass your personal information on to any third parties for marketing purposes.

10. Complaints

If you are unhappy about the way that we have handled or used your personal information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (**ICO**). Please do contact

us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that we have the opportunity to discuss this with you and to take steps to resolve the position. You can contact us using the details set out at the beginning of this privacy notice.

11. Third Party Websites

Our website may contain links to third party websites. If you click and follow those links then these will take you to the third party website. Those third party websites may collect personal information from you and you will need to check their privacy notices to understand how your personal information is collected and used by them.