

# Privacy Policy

Welcome to Wardrobe Couture Ltd. Please review our terms and conditions on which we supply our services and products to you.

## 1. *Introduction and General Terms*

Wardrobe Couture Ltd, a company registered in England and Wales under company number 10374533 ("Wardrobe Couture", "we", "us" or "our" in this policy), operates a global fashion concierge that sources and delivers bespoke fashion for women and men ("Services").

If you have any questions or comments about this privacy policy please contact us via:

Email: [info@wardrobecouture.com](mailto:info@wardrobecouture.com)

Wardrobe Couture is committed to protecting and respecting your privacy. This policy explains the basis on which personal information we collect from you will be processed by us. Where we decide the purpose or means for which Personal Data you supply through these Services is processed, we are the "data controller." We will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679.

This policy explains the following: What information Wardrobe Couture may collect about you, how Wardrobe Couture will use information we collect about you, whether Wardrobe Couture will disclose your details to anyone else. Your choices and rights regarding the personal information you have provided to us. Our Services may require the use of third parties. These third party websites may have their own privacy policies and we recommend you to review them. We do not accept any responsibility or liability for the privacy practices of such third parties and your use of them is at your own risk.

## 2. *What information will we collect?*

We collect and process the following information which may include your Personal Data.

### **Information provided by you when using or requesting our Services**

When using, or requesting our Services, we may collect information that you provide to us about you via chat-based media such as WhatsApp or email. This can include (but is not limited to) any information provided via chat with one of our employees including your name, address, clothing size, age, gender, address, telephone number and e-mail address ("Personal Data").

### **Payment Information**

In order for you to use all the functions of our Services we collect payment information from you including your credit card number and bank account details.

### **Information about you collected from Third Parties**

We may collect Personal Data about you from third party service providers. This includes information about your credit history from credit agencies, or information to check your identity and prevent fraud or other illegal activities.

We may also measure your engagement on social media platforms, such as Instagram, by tracking your likes.

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## *3. Data sharing*

We will share your information with third parties only in the ways that are described in this privacy policy. If you would like to find out more about how the third parties listed in this policy use your information, this should be set out in their respective privacy policies. We keep your information confidential, but may disclose it to our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this privacy policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard this information.

In addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

## *4. How we will use information we collect about you and who will we share it with*

### **Providing the Services to you – Prospective Customer**

We may legally use and retain your Personal Data you provide to us when requesting our Services, to pursue our legitimate interest of building a client profile for you in order to identify and suggest the sort of products that may be of interest to you as part of our Services.

These Services may include; responding to your enquiry or request; contacting you about any purchases or products in respect of your enquiry or request and taking steps you ask of us with a view to entering into an agreement to provide you with our Services.

### **Providing the Services to You – Customer**

We may legally use your Personal Data on the basis that processing is necessary for the performance of delivering our service under the contract between you and Wardrobe Couture, including to respond to your enquiries; to contact you about any purchases or products requiring your attention and to provide you with information about the Services we offer.

We may analyse certain types of information that you submit to us included in the content of your chats and emails with our personal shoppers for the legitimate interest of solely improving the Services we offer to you, to create chat data insights, and to provide you with a tailored and bespoke service.

We may share your Personal Data with our selected third party retailers and suppliers for the performance of delivering our service under the contract between you and Wardrobe Couture, including placing orders, purchasing products on your behalf and in accordance with your instructions and delivering the goods to you. Our third party retailers will have their own processing terms.

We may use a third party payment Services provider to process payment for our Services, Stripe (a PCI Service Provider Level 1 certified platform), who will store, collect and process your payment details over SSAL (Secure Sockets Layer). When using Stripe, our servers will not have access to your sensitive payment details.

## **Compliance and prevention of Fraud and Illegal Activity**

We may process Personal Data for the legitimate interests of ensuring that use of our online Services is lawful and non-fraudulent, does not disrupt the operation of our Services, does not harass our staff or other individuals, and to enforce our legal rights and comply with our legal obligations.

We process Personal Data for the legitimate interest of complying with HMRC requirements by retaining records of customer purchases and transactions.

Where we reasonably believe that you are or may be in breach of any of the applicable laws, we may use your personal information to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

## **Marketing**

We use various forms of marketing to provide you with promotional materials about our Services.

We may process your information for the purposes of marketing (or pass your information on to third parties for marketing purposes) in accordance with our legitimate interests to send you information about offers, our Services or similar products to which you purchased in order to provide you with a tailored and bespoke service.

Targeted Marketing: serve you targeted advertisement via our own channels and third party channels, including across multiple devices or browsers. We do this to provide you with more relevant advertising content.

Facebook Inc

Twitter Inc

Google Inc.

## **Analytics**

Our website uses cookies and other mechanisms to collect log and analytical information, such as your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use (Technical Data) to help analyse how visitors use the site and to compile statistical reports on website activity.

As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. Please see <http://www.allaboutcookies.org/> for further information about cookies.

We process this information to understand how visitors use our website and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our website, and we aggregate this information together so we know that).

This processing is necessary for us to pursue our legitimate interests in improving our website, and providing a better service and source of information to visitors. This information is not used to develop a personal profile of you. All such information is aggregated and stored anonymously.

We may receive the above data about you from Google, Inc. (based outside the EU) through their Google Analytics platform. Please see below for further information. To find out more about Google Analytics and to learn how to opt out, please visit:

How Google uses data when you use our partners' sites or apps, or

<https://tools.google.com/dlpage/gaoptout/>.

When you visit our Website, these analytics service providers may collect the following data, which will almost always be anonymised and aggregated before reporting back to us:

number of visitors to our Website

pages visited while at the Website and time spent per page

page interaction information, such as scrolling, clicks and browsing methods

websites where visitors have come from and where they go afterwards

page response times and any download errors

other technical information relating to end user device, such as IP address or browser plug-in

We process this information to understand how visitors use our Website and to compile statistical reports regarding that activity. This processing is crucial to the running of our online business. This information is not used to develop a personal profile of you

## **To Understand how our Services are used**

We process information that we collect via Instagram and Facebook to understand how customers or visitors use our website and to compile statistical reports regarding that activity.

This processing is necessary for us to pursue our legitimate interests of providing a tailored service to our customers.

## 5. *Your rights in relation to personal data which we process relating to you*

You have the following rights over the way we process Personal Data relating to you. We aim to comply without undue delay, and within one month at the latest.

### **Ask for a copy of data we are processing about you and have inaccuracies corrected**

You have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected.

We will use reasonable efforts to the extent required by law to supply, correct or delete personal information held about you on our files (and with any third parties to whom it has been disclosed to).

### **Object to us processing data about you**

You can ask us to restrict, stop processing, or to delete your Personal Data by contacting us at [info@wardrobecouture.com](mailto:info@wardrobecouture.com) if:

Wardrobe Couture no longer needs to process that Personal Data for the reason it was collected;

Wardrobe Couture is processing that Personal Data because it is in the public interest or it is in order to pursue a legitimate interest of Wardrobe Couture, you don't agree with that processing, and there is no overriding legitimate interest for us to continue processing it;

the Personal Data was unlawfully processed;

you need the Personal Data to be deleted in order to comply with a legal obligations;

the Personal Data is processed in relation to the offer of a service to a child.

If you inform us that you would no longer like us to store or process your Personal Data then we may not be able to offer you a fully tailored, bespoke service.

### **Obtain a machine readable copy of your Personal Data, which you can use with another service provider**

If we are processing data in order to perform our obligations to you, if that processing is carried out by automated means, we will help you to move, copy or transfer your Personal Data to other IT systems.

If you request, Wardrobe Couture will supply you with the relevant Personal Data in CSV format. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.

### **Make a complaint to a Supervisory Authority**

If you are unhappy with the way Wardrobe Couture is processing your Personal Data, please let us know.

If you do not agree with the way we have processed your data or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority.

## 6. *Data retention*

We will hold your personal information on our systems for as long as is necessary for the relevant service or as required by law, or for accounting or regulatory purposes, or as otherwise described in this privacy policy.

## 7. *Security*

We will take all reasonable technical and organisational precautions to prevent the loss misuse or alteration of your personal information.

Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

## 8. *Changes*

We will notify you of any changes to this policy by email, notice on the website or account message.

## *9. International data transfers*

Where we transfer your data outside of the EEA, we have agreements in place with those parties which include standard data protection clauses adopted by a data protection regulator and approved by the European Commission to ensure that appropriate safeguards are in place to protect your Personal Data. If you would like to find out more about these safeguards, please let us know by writing to [info@wardrobecouture.com](mailto:info@wardrobecouture.com)