

## PRIVACY POLICY

At Brooks Park Digital Limited, we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

### WHO ARE WE?

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Brooks Park Digital Limited

Company Number: 08993871

Registered Office: Paragon Partners, Churchill House, 137 - 139 Brent Street, London, England, NW4 4DJ

Registered in, and governed by the laws of, England and Wales .

### HOW DO WE COLLECT INFORMATION FROM YOU?

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We obtain information about you when you use our website, when you place an order, request a catalogue, join our mailing list, enter a competition, submit feedback or apply for a vacancy.

### WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

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The personal information we collect might include your name, address, email address, email click through information, IP address, and information regarding what web pages are accessed and when.

If you make a purchase online, over the telephone or from a store, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

If you have applied for a job, we will collect your CV, covering letter and contact details.

### WHY IS IT BEING COLLECTED?

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We use the information we hold on your records for operational purposes, for example processing your order, dealing with queries, tracking deliveries, reviewing past purchases.

Your order history enables us to tailor our product range and marketing information (e.g. promotions and special offers) to your requirements.

If you opted in, we also use the information to keep you up to date with Teapot Whistles / Brooks Park Digital Limited: mailing new catalogues and sending emails as appropriate. You can opt-out at any time.

If you have opted in, we may make your postal mailing list available to carefully selected companies. You can opt-out at any time.

For purposes of quality control and training, calls and emails may be monitored.

## HOW LONG DO YOU RETAIN DATA?

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We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. You may check details on how long we retain information by contacting the Data Protection Officer.

## HOW WILL IT BE USED?

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We may use your information to:

- Process any orders that you have made.
- To carry out our obligations arising from any contracts entered into by you and us.
- Dealing with entries into a competition;
- Seek your views or comments on the products or services we provide.
- Notify you of changes to our services;
- Send you communications which you have requested and that may be of interest to you, including: Catalogues, Mailings, Activities, Promotions and Product Launches.
- If you have opted in to hear from carefully selected partners.

## WHO HAS ACCESS TO YOUR INFORMATION?

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We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to post your order, mail you a catalogue or fulfil a made-to-order purchase). However, when we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have opted-in to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our secure online payment page, placing an order by telephone or through a store, your order is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your personal information to a third-party as part of a sale of some or all of our business and assets to any third-party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

When you have consented to receive marketing from selected partners, we use data pools to fulfil this request. Data pools are groups of retailers who share information on what their customers buy. The participating retailers are active in the clothing, collectables, food & wine, gardening, gadgets & entertainment, health & beauty, household goods, and home interiors categories. This pooled information is analysed to understand consumer's wider buying patterns. From this information, customers are sent tailored communications containing suitable communications that should be of interest to them based on what they like to buy. We do not share email addresses for the purposes of data pooling. You may unsubscribe from these at any time by emailing: [info@teapotwhistles.com](mailto:info@teapotwhistles.com).

## YOUR CHOICES

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You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

You can change your marketing preferences at any time. You can contact us by email: [info@teapotwhistles.com](mailto:info@teapotwhistles.com)

## HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION

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The accuracy of your information is important to us.

If you would like to amend any of your information you can do so in the following ways:

- You can email: [info@teapotwhistles.com](mailto:info@teapotwhistles.com)
- You can write to Data Protection Officer, Teapot Whistles, 31 Standen Road, London SW18 5TH.

You have the right to ask for a copy of the information Brooks Park Digital Limited holds about you via an 'Subject Access Request'.

## SECURITY PRECAUTIONS

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When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## PROFILING

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We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. You can opt-out of profiling by writing to Data Protection Officer, Teapot Whistles, 31 Standen Road, London SW18 5TH.

## USE OF COOKIES

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Like many other websites, the Teapot Whistles website uses cookies. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off Cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning Cookies off may result in a loss of functionality when using our website.

## LINKS TO OTHER WEBSITES

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Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

## TRANSFERRING YOUR INFORMATION OUTSIDE OF THE EEA

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As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

## DATA PROTECTION OFFICER

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Any questions regarding this Policy and our privacy practices should be sent by email to [info@teapotwhistles.com](mailto:info@teapotwhistles.com) or by writing to Data Protection Officer, Teapot Whistles, 31 Standen Road, London SW18 5TH.

## COMPLAINTS

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Data subjects are able to complain to Brooks Park Digital Limited about: How their personal data has been processed, How their request for access to data has been handled, How their complaint has been handled, Appeal against any decision made following a complaint. To do so, lodge a complain by contacting the Data Protection Officer (details above). Complaints should be resolved with one month.

## REVIEW OF THIS POLICY

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We keep this Policy under regular review. This Policy was last updated in July 2018.