#### LOOPWHEELS DATA PROTECTION POLICY

#### Introduction

This notice applies across all our activity including all websites that we own and operate and all services we provide.

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, bank account details, payment information, product queries, feedback and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply.

We may need to update this notice from time to time. Where a change is significant, we'll make sure we let you know – usually by sending you an email.

Last updated: 14 May 2018

### Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means Jelly Products Limited, Registered Company number 06012537. We trade as Loopwheels and as Jelly Products. Our headquarters are in the UK and we have no subsidiaries. Our address is Unit 202 Boughton Industrial Estate, Boughton, Newark, Nottinghamshire NG22 0DH UK. We design, manufacture and sell wheels with integral suspension, and we sell related accessories.

## Our principles of data protection

Our approach to data protection is built around two key principles. They're at the heart of everything we do relating to personal data. **Transparency:** We take a human approach to how we process personal data by being open, honest and transparent. **Security:** We keep secure the personal data you entrust to us.

### How we collect your data

When you visit us, contact us by email, phone us, or talk to us at an exhibition or show, we may collect personal data. The ways we collect it can be broadly categorised into the following:

**Information you provide to us directly:** When you speak to us or use some parts of our website we might ask you to provide personal data to us. For example, if you sign up to receive our newsletter, join us on social media, ask for a quotation, purchase products from us, or contact us with questions. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or buy products from us. For people in the UK who are registered disabled, we have a statutory obligation to ask you to make a declaration if wish to claim VAT exemption on your purchase of certain of our products, and to provide this to HMRC at their request. In addition to this legal requirement, we will ask you for your consent to use this VAT declaration data anonymised and in an aggregated form to understand better who our customers are and what conditions they have, and to inform our product development. You don't have to agree to us using your data for our own purposes unless you wish to.

Information we collect automatically: We collect some information about you automatically when you visit our website, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and what products you're interested in.

We don't generally collect information about you from third parties. The one exception to this is if a dealer or distributor of our products passes your name or contact details to us in order to ask us for support or to supply you with one of our products.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- · where we have your consent.

### How we use your data

First and foremost, we use your personal data to process an order you've placed with us and provide you with any products you've purchased, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

## **To communicate with you.** This may include:

- providing you with information you've requested from us (like information about our products or a quotation for some products) or information we are required to send to you
- operational communications, like tracking information about a product you've purchased
- marketing communications in accordance with your marketing preferences – this is our Mailchimp newsletter
- asking you for feedback or to take part in any research we are conducting.

**To support you:** This may include assisting with questions you have about our products or about your product warranty **To analyse, aggregate and report:** We may use the personal data we collect about you and other users of our website to

produce aggregated and anonymised analytics and reports, for example which countries we have followers in. We would only share this information in an aggregated and anonymised way.

# How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- the Loopwheels distributor or your nearest stockist of our products and only with your consent.
- our third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on our website
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure. For example, for UK customers who are registered disabled we collect a declaration from you about VAT exemption and must provide this to HMRC at their request.
- other people where we have your consent.

# Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and we believe we have appropriate technical and organisational measures in place to make sure that happens.

#### Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a product or

information you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

## Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to info@loopwheels.com

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data You can exercise these rights at any time by sending an email to info@loopwheels.com

If you're not happy with how we are processing your personal data, please let us know by sending an email to <a href="mailto:info@loopwheels.com">info@loopwheels.com</a> We will review and investigate your complaint, and try to get back to you within a reasonable time frame. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.

#### How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question

or feedback for us on this notice, our website or our products, please get in touch.

Our email is <a href="mailto:info@loopwheels.com">info@loopwheels.com</a>. You can also write to us at Unit 202 Boughton Industrial Estate, Boughton, Newark, Nottinghamshire NG22 9LD UK.

14 May 2018