

STOREFEEDER PRIVACY NOTICE & COOKIES POLICY

Document Control

<i>Document Owner:</i>	<i>Date Approved</i>	<i>Next Review Date:</i>
Iain Thomson	June 2019	Annual review required

Privacy and Cookie Notice

Revision History:

Version	Revision Date	Revised by	Section Revised
V1.0	25-05-18	Iain Thomson	
V1.1	12-06-19	Iain Thomson	Circulated and reviewed for updates. None required
V1.2	15-01-20	Iain Thomson	Comms address update to reflect new office location.

Privacy and Cookie Notice

Who We Are

This privacy notice sets out how **StoreFeeder Ltd** [Company Number 06585175] (“StoreFeeder”) uses and protects any personal information that you provide to StoreFeeder, or which we may receive from other sources. Our registered office address is: 100 Victoria Embankment, London, EC4Y 0HQ. StoreFeeder is a wholly owned subsidiary of The Royal Mail Group.

StoreFeeder want visitors to its website to be able to take part fully in the functionality of its website. We are committed to do this in a way that does not infringe your right to privacy.

Please read the following carefully. By continuing to use this website you accept the practices described within this policy.

Who is the Data Controller (for the purposes of Data Protection Law)?

1. StoreFeeder may receive personal data from Merchants that use our service which relates to customers of those Merchants. In this situation the **Merchants** are the Data Controllers of **their** customers' data. StoreFeeder are **Data Processors** in this instance. If you are a customer of a Merchant that uses our services, we would recommend that you contact the relevant Merchant, who is the Data Controller. As such, any queries received by StoreFeeder in relation to the tasks and obligations of the Data Controller within that relationship, will be advised to contact the relevant merchant that that sale was purchased through.
2. StoreFeeder may also receive personal data relating to its own customers (i.e. the Merchants themselves as well as their employees and agents) over the course of the provision of the services. In respect of this information StoreFeeder is the Data Controller.

Information that we may collect from you

We may collect and process the following data about you:

- Contact details that are provided by filling in forms on this site when e.g. provided at the time of registering to use our services or requesting further services details from us. Please let us know if any of this information changes so we can keep our records up to date.
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

Information we receive from other sources.

- Through the use of StoreFeeder's service, we may receive transient (temporary) information that enables the use of our software e.g. details of transactions Merchants' customers may have inputted through the Merchants' sales channel (e.g. Ebay, Amazon etc.) that has been linked to our service to enable the fulfilment of the Merchants customers' order.
- We may receive information about you from Merchants who use our service.

Uses made of the information

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to login or control the interactive features of our online services, when you choose to do so.
- Where it is necessary for our legitimate interests, i.e. to operate our company and provide (including improving and personalising) the products and services we offer.
- To notify you about changes to our service or service effecting incidents.
- To conduct surveys for market research purposes. We may use the information gathered from such market research to customise the website according to your interests.
- Where we need to comply with a legal or regulatory obligation.

Privacy and Cookie Notice

Disclosure of your information

We disclose personal data to third parties involved in the provision of the service such as logistics providers, IT providers and Merchants

Additionally, we will disclose your personal information to the relevant third party:

- a. in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- b. if we are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and
- c. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. 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.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

How long we will keep your personal data

We will only retain your personal data for so long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements (typically six years after the end of any contract with you).

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk 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.

Changes to our privacy policy

This policy may be updated from time to time. Please check back frequently to see any updates or changes to our privacy policy.

Your rights in respect of your personal data

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at dataprotection@storefeeder.com. You have the right:

Privacy and Cookie Notice

- a) To ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes;
- b) To ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- c) To ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest;
- d) To request from us access to personal information held about you. To submit your SAR, you can contact us at dataprotection@storefeeder.com using this [form](#).
- e) To ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- f) To ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services;
- g) To ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected, or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); and
- h) To ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

To exercise any of these rights or should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us at dataprotection@storefeeder.com or you can also submit your request in writing to:

StoreFeeder
FAO Compliance Manager
Unit 2, Colliers Way,
Phoenix Business Park,
Nottingham.
NG8 6AT.

Cookies - How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Privacy and Cookie Notice

List of Cookies we use on this site:

[Last Update: May 2019]

Strictly Necessary Cookies (StoreFeeder Main website mystorefeeder.com)

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

1. **.SF-Login:** Used to enable the User to log into StoreFeeder
2. **ASP.NET_SessionId:** Used for maintaining the User's StoreFeeder session
3. **STOREFEEDERCOURIERAUTH:** Used for Authentication
4. **StoreFeeder.AjaxGrid:** Used for maintaining website grid state
5. **Storefeeder.FieldChooser:** Used for maintaining website grid state
6. **StoreFeeder.Messages** - Used for user messages
7. **StoreFeederDashboard** – Stores Dashboard filters
8. **ARRAffinity:** Azure server affinity token
9. **UserMessage:** Used for displaying a user message within StoreFeeder
10. **__AntiXsrfToken:** Used to stop Cross-Site request forgery attacks
11. **SF_printerSettings** – Print settings for your account
12. **SF_PrintServiceUserEnabled** – Whether silent print is enabled for the account
13. **SF_PrintInfoCollapsed** – Whether the print info is displayed

Targeting Cookies (Brochure Site – storefeeder.com)

These cookies do not store directly personal information but are based on uniquely identifying your browser and internet device. They are in use for the functionality of StoreFeeder's online brochure:

1. **_gid: Google Analytics** (Retained for 24hrs) Used to distinguish users.
2. **_gat_storefeeder2: Google Analytics** (Retained for 1 minute) Used for throttle rate control.
3. **_gat_storefeeder: Google Analytics** (Retained for 1 minute) Used for throttle rate control.
4. **_ga: Google Analytics** (Retained for 2 years) Used to distinguish users.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information. Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate whether you want the information to be used for marketing purposes. This choice can always be changed should you wish by changing your privacy settings in your account details.