



## **PRIVACY POLICY FOR CUSTOMERS**

### **1. Background**

Migrateful understands that your privacy is important to you and that you care about how your personal data is used and shared online. We (Migrateful) respect and value the privacy of everyone who visits [www.migrateful.org](http://www.migrateful.org) ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner which is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully. You will be required to read and accept it when making a purchase from us or signing up to our mailings.

### **2. Information About Us**

Our Site is owned and operated by Migrateful, a Charitable Incorporated Organisation registered with the Charity Commission (Registered Charity Number 1180110).

### **3. What Does This Policy Cover?**

This Privacy Policy applies only to your use of our site. Our site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4. Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data;
- The right of access to the personal data we hold about you (see section 9);
- The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 11);
- The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you. (We only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 11);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 11 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## 5. What Data Do We Collect?

Depending upon your use of our site, we may collect some or all of the following personal and non-personal data:

- name;
- date of birth;
- gender;
- contact information such as email addresses and telephone numbers;
- demographic information such as post code, preferences, and interests;
- financial information such as credit / debit card numbers;
- dietary requirements.

## 6. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- To process your orders;
- To contact you in the event of any problems with your order;
- To answer your queries and to inform you of new or changed services;
- To send you information on offers and newsletters;
- To make analyses in order to provide you with relevant offers and information;
- To send you surveys in order to give you a possibility to influence our offer and services and so we can understand the impact our services are having on our customers;

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We will keep your data for as long as necessary to fulfil the purposes above or for as long as we are required by law. After this your personal data will be deleted.

## 7. How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.

Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using our site and submitting information to us. If we do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

## 8. Do We Share Your Data?

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

## **9. How Can You Control Your Data?**

In addition to your rights under the GDPR, set out in section 4, when you submit personal data via our site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

## **10. How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at [info@migrateful.org](mailto:info@migrateful.org), or using the contact details below in section 11.

## **11. Contacting Us**

If you have any questions about our site or this Privacy Policy, please contact us by email at [info@migrateful.org](mailto:info@migrateful.org). Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## 12. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the alterations. We recommend that you check this page regularly to keep up-to-date.