



# Privacy Policy v7.0 (March 2024)

## 1. Introduction

At MandM Direct, we respect your privacy and are committed to protecting your data. This policy sets out how we look after your personal data when you visit our website, tells you about your rights and how the law protects you.

## 2. Who we are and other important information

This policy provides information on how we collect and process your personal data through use of our website, including any data you may provide through this website when you purchase a product or open an account with us.

This website is not intended for children and we do not knowingly collect data relating to children.

This policy should be read together with any other privacy policy we may provide on specific occasions when we are collecting your personal data. This policy supplements other notices and policies and is not intended to override them.

The MandM Group is made up of two legal entities so when we mention "Stylepit" "we" "us" or "our" etc we are referring to the relevant company in the Group responsible for processing your data. MandM is the controller in regard to all Personal Data we collect about our customers, in the course of providing our services and are responsible for this website.

Our privacy team is responsible for overseeing questions in relation to this privacy policy.

If you have any comments or concerns regarding our use of your personal data, please contact us:

- by email at [privacy@mandmdirect.com](mailto:privacy@mandmdirect.com); or
- by post at **Compliance, MandM, 1 Auctioneer Walk, Old Market, Hereford HR4 9HT, United Kingdom.**

Customers outside the UK may prefer to contact our EU Representative at [privacy.heartland@heartland.co](mailto:privacy.heartland@heartland.co). Based in Denmark, our EU Representative also acts as a point of contact for supervisory authorities across Europe. Alternatively you can also contact your local supervisory authority.

You have the right at any time to lodge a complaint with the Information Commissioner's Office ("ICO") <https://ico.org.uk>. However we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**CHANGES TO THIS PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**  
We keep our privacy policy under regular review. This version was last updated on March 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **3. What information do we collect about you?**

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of information about you which we have grouped together as follows:

- **Identity data** includes first name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and platform .
- **Profile Data** includes your username and password, purchase or orders made by you, your preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website
- **Marketing and Communications Data** includes (your preference in receiving marketing from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will never ask for any Special Category Personal Data about you (i.e. sensitive information about your race, ethnicity, religion, health, religious or political beliefs, sex life, sexual orientation, genetic or biometric data). Nor do we collect any data about criminal convictions or offences.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able

to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

#### **4. How is your personal data collected?**

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- create an account on our website;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the UK;
- (b) advertising networks such as Google, Microsoft, TikTok, Twitter, Partnerize and Meta based outside the UK
- (c) search information providers such as Fredhopper based inside the UK.

#### **5. How will we use that information?**

We will use your Personal Data only when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out in the table below, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

#### MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

You will receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

#### THIRD-PARTY MARKETING

We never share your personal data with any third party for marketing purposes.

#### OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into your account and checking or unchecking relevant boxes to adjust

your marketing preferences OR by following the opt-out links on any marketing message sent to you OR by contacting us at any time at [privacy@mandmdirect.com](mailto:privacy@mandmdirect.com)

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.mandmdirect.ie/02/stp/cookies>.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>

<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## 6. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set



out in the table above.

- Internal Third Parties as set out in the Glossary
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. Overseas transfers**

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside of the UK.

Whenever we transfer your Personal Data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **8. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship 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 of harm 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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## **10. Your Legal Rights**

Under data protection laws, in certain circumstances you have rights in relation to your personal data:

### **Right to access**

You have the right to request a copy of any Personal Data that we hold about you. This is commonly known as a “Subject Access Request” and to check that we are lawfully processing it.

## **Right to rectification**

If any of the Personal Data we hold about you is inaccurate, you can either:

- visit the “MyAccount” section of the website where you can make changes to some of the information that we hold about you; or
- request that we correct your Personal Data, though we may need to verify the accuracy of the new data you provide to us.

## **Right to be forgotten**

You can ask that we erase all or some Personal Data that we hold about you, where there is no good reason for us to continue to process it. This right also extends to where you have successfully exercised your right to object to processing (see below), where we may have processed your data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request.

## **Right to object**

You have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

## **Right to restrict processing**

You have the right to request that we restrict the use of your Personal Data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your Personal Data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your Personal Data, but we need to verify whether we have overriding legitimate grounds to use it.

## **Right to request a transfer**

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## **Right to withdraw consent**

You have the right to withdraw your consent where the lawful basis for processing your personal data is consent as detailed in this privacy statement. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw consent.

## **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. THIRD PARTIES**

### EXTERNAL THIRD PARTIES

We share personal information with third parties who perform services on our behalf. We use third parties to :

- **IT Companies** – Supporting us in maintaining our website, support with website tracking services and other business systems including; providing , data storage facilities, and providing and supporting Cloud based infrastructure used in providing our products and services.
- **Delivery partners** – Helping us to deliver the goods you order and handle returns if necessary.
- **Payment providers** – to process credit and debit card payments for you.
- **Marketing and online advertising** – Helping us to manage our electronic communications to you and to help us show you the advertising you are most likely to be interested in, companies that provide marketing and advertising assistance (including management of email marketing operations, mobile messaging services such as SMS, and services that deploy advertising on the internet or social media platforms, such as Facebook and Google) as well as analysis of the effectiveness of our advertising and communications campaigns.

- **Customer services** – Help customers with queries via our website and social media. So customers can submit reviews about us.

A full list of the Third Parties we use can be found [here](#).

## 12. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.