

PROJECT IMAGINE PRIVACY POLICY

At Project Imagine Ltd we respect your privacy and are committed to protecting your personal data. In this privacy policy we will outline how we will use, process and store any personal data we collect from you or that you provide to us, either through our website or otherwise. We will also tell you about your privacy rights and how the law protects you.

We are the data controller responsible for any personal data we collect from you. We are registered as company number 11153882 in England and Wales.

Our privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

CONTENTS

[1. The data we collect about you](#)

[2. How is your personal data collected?](#)

[3. How we use your personal data](#)

[4. How we share your personal data](#)

[5. Data security & international transfers](#)

[6. Data retention](#)

[7. Cookie Policy](#)

[8. Your legal rights](#)

[9. Glossary](#)

1. The data we collect about you.

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website or otherwise, including any data you may provide when you purchase a product or service, sign up to our newsletter or an event with us, take part in a competition or survey, or apply for a job with us. We may also collect and use information about you that is provided by third parties. This website is not intended for children and we do not knowingly collect data relating to children.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your name, username or similar identifier, marital status, title, date of birth, gender, personal description and photographs.
- **Contact Data** includes contact address, delivery address, email address and telephone numbers.
- **Telephone Log Information** includes phone number, calling-party number, forwarding numbers, time, date and duration of calls, SMS routing information and types of calls, and the content of any calls.
- **Device and Location Data** includes information on your mobile phone network, on the operating system you use, information that enables identification of your device. If you use our app we will link your mobile number to your device. Location information provided by our technology using your IP address or GPS sensors.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **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 notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data to us 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.

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 notice of every website you visit.

We use certain software in order to better understand our users' needs and to optimise our service and the user experience:

1. [Hotjar](#) is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages and which links they choose to click) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile, meaning that you cannot be identified by this. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user.

For further details, please see Hotjar's privacy policy by clicking on [this link](#). You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

2. Statcounter is also a technology service that helps us to better understand our users experience by tracking activity on our website (e.g. how users find our website, how long they spend on it and which web pages they find most interesting). Statcounter uses cookies and other technologies to collect data on users and user activity on our website. This data includes, time and date of visit (this can help us to identify and plan for busy periods on our website), IP address (captured and stored only in anonymized form), browser and operating system (this can help us to make sure that our website functions correctly in the browsers/operating systems used to access our website), device information (this can help us to make sure that our website functions correctly in the devices used to access our website) and referring data e.g. a search engine link (this can help us to understand which search engines are helping users to find our website).

Furthermore, when you visit our website a Statcounter cookie (called "is unique") may be placed in your browser. This cookie is used only to determine whether you are a first-time or returning visitor and to estimate unique visits to our website. No personal information is stored in the cookie. Neither Statcounter nor we will ever use this information to identify individual users or to match it with further data on an individual user.

For further details, please see the Statcounter privacy policy by clicking on the following link: <https://statcounter.com/about/legal/#privacy>. You can learn more about cookies from Statcounter and set your browser to refuse same here: <http://statcounter.com/about/set-refusal-cookie/>.

2. How is your personal data collected?

There are various ways we collect data from and about you, including through:

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

- apply for our products or services.
- create an account with us.

- subscribe to our service or publications.
- request marketing to be sent to you.
- enter a competition, promotion or survey.
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may 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 below for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as analytics providers, advertising networks, search information providers, business partners, subcontractors in technical, payment and delivery services (based inside or outside the EU), data brokers or aggregators, credit reference agencies, Companies House and the Electoral Register based inside the EU.

3. How we use your personal data.

We will only use your personal data 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. To administer our business, including data analysis, research, troubleshooting, statistical and survey purposes and security.
- To ensure our website, app, products and services are as effective and relevant as possible to provide you the best service possible.
- 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 or regulatory obligation.

The table below sets out the ways in which we may use your personal data and what is the legal basis to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To fulfil our obligations in any contract you have entered into or will enter into with us. Including: Processing and delivering your order. Operating bank accounts, managing transfers, payments, fees and charges. Collecting and recovering money owed to us.	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our service, terms or privacy policy. Asking you to leave a review or take a survey.	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey.	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests. To study how customers use our products/services, to develop and improve them and grow our business.
To administer and protect our business and this website including: troubleshooting, data analysis, testing, verifying customer identity, combatting fraud, system maintenance, support, reporting and hosting of data.	Identity Contact Technical	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. Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Identity Contact Profile Usage Marketing and Communications Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Identity Profile Technical Usage	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing communications. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will only receive marketing communications from us where you have requested them – for example if you provided us with your details when you registered with us and you opted-in to receive information about our products, services and company news. It is core to our business that we do not share your information for the purposes of any third-party marketing. If this were to change we will get your express opt-in consent before we share your personal data for marketing purposes.

Opting out. You can ask us to stop sending you marketing messages at any time by logging into your account to adjust your marketing preferences or by following the “unsubscribe” links on any marketing message sent to you or by contacting us at any time at hello@projectimagine.com

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at hello@projectimagine.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. How we share your personal data.

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 3 above.

- Internal Third Parties. Other companies in the Project Imagine Group (acting as joint controllers or processors) who are based in EEA and non-EEA countries and provide IT and system administration services.
- External Third Parties. Business partners, subcontractors, suppliers and professional advisers. Including lawyers, bankers, market researchers, auditors and insurers based in EEA and non-EEA countries who provide consultancy, banking, legal, insurance and accounting services.
- Credit reference and fraud prevention agencies, HM Revenue & Customs, regulators and other authorities (based in the UK) who require reporting of processing activities in certain circumstances. Please note that the personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance arrangements and/or employment contracts. Further details of how your information will be used by fraud prevention agencies, alongside your data protection rights, can be found by www.cifas.org.uk/fpn.
- Police and other law enforcement bodies.
- 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 notice.

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.

5. Data security & international transfers

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.

International transfers. The majority of the time the data we collect about you will be stored and processed on servers in the EEA. However, occasionally your information may be stored or processed outside of the EEA in order for us to fulfil our contractual obligations to you and provide our products and services. Whenever we

transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers in non-EEA countries, we will use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

The transmission of information via the internet can never be 100% secure. While we will do our best to protect your personal data we cannot guarantee its security and any data you send to us via our website or our App is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements.

By law we have to keep basic information about our customers including Contact, Identity, Financial and Transaction Data for 6 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see the *Request erasure* section below under “Your Legal Rights” for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. Cookie Policy

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another. Our website uses cookies to distinguish you from other users helping us to provide you the best service possible when you browse our site. They allow us to make improvements, recognise you when you return to our site, store information about your preferences and provide you with content which may interest you. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

The cookies are placed by software that operates on our servers, and by software operated by third parties whose services we use. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. If choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to count the number of visitors to the site and see how and when they use it
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site and to enable you to log into secure areas of our website and enter into transactions
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

We have the following types of cookies on our website:

- DYNRSV cookie which our hosting provider sets for technical reasons to balance the traffic.
- Google Analytics cookies. You can read about their usage on this page: <https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>
- Hotjar and Statcounter cookies which help us analyse usage and customer experience of our website

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

We also use Facebook tracking pixels and Twitter tracking pixels.

8. Your legal rights

You have rights under data protection laws with regards to your personal data. You will find more details of these rights below:

Request access to your personal data. You may at any time review or update personally identifiable information that we hold about you, by signing in to your account on our website. To obtain a copy of any information that is not provided on our website you may send us a request at hello@projectimagine.com.

Request correction of your personal data. We will be happy to correct or update any incomplete or inaccurate personal data of yours which we hold. We may need to verify the accuracy of the new data you provide us. If you need to correct any data please contact us at hello@projectimagine.com

Request erasure of your personal data. You may request the removal or deletion of your personal data if there is no good reason for us to continue to hold it or process it. However please note that we may not always be able to comply with your request due to legal reasons which we will make clear to you. We are obliged to hold on to certain data for a minimum of 6 years. It may be impossible to permanently delete your information, where this is the case we will put that information beyond reasonable use. Please note that any information you have shared publicly on our website may remain available. If you wish to request erasure please contact us at hello@projectimagine.com

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. If you wish to make this request please contact us at hello@projectimagine.com

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal data. You may ask us to transfer your personal data to you or 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. But please note that we may also need to retain it for the reasons set out in the table in section 3. If you wish to request this please contact us at hello@projectimagine.com

Right to withdraw consent. You may withdraw your consent at any time where we are relying on consent to process your personal data. But if you do withdraw your consent we may not be able to provide you with our products and services, if this is the case then we will inform you of it. Withdrawing your consent does not affect the lawfulness of any processing of your data that was carried out before you withdrew your consent.

Fees. Usually there is no fee required to access your personal data or to make any of the other requests outlined above. However we may decide to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or we may even refuse to comply with your request. We try to respond to all legitimate requests within one month. Occasionally it may 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. 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.

We welcome any questions you may have with regards to this Privacy Policy and your personal data. You may contact us at hello@projectimagine.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

9. Glossary

“We”, “us” or “our” means Project Imagine Ltd and all of its affiliates.

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 at hello@projectimagine.com

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

EEA means European Economic Area.

EU means the European Union.