# **Privacy Policy**

#### Introduction

Welcome to the Works of Wisdom privacy policy.

Works of Wisdom registered office at:

Piccadilly Business Centre

Unit C Aldow Enterprise Park

Blackett Street

Manchester

M12 6AE

("Works of Wisdom", "we" or "us"). We respect your privacy and take our responsibilities seriously in relation to the processing and security of your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our stores and/or our website <a href="www.worksofwisdom.co.uk">www.worksofwisdom.co.uk</a> (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Works of Wisdom collects and processes your personal data through your use of this website, including any data you may provide through this website when you create an account, sign up to our newsletter and emails, purchase a product or service, take part in a competition or provide a review.

## **CONTROLLER**

This privacy policy is issued on behalf of the Company so when we mention "Works of Wisdom", "we", "us" or "our" in this privacy policy, we are referring to the relevant company responsible for processing your data.

We have appointed a privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the privacy officer using the details set out below.

CONTACT DETAILS

Privacy Officer

Piccadilly Business Centre

Unit C Aldow Enterprise Park

Blackett Street

Manchester

M12 6AE

Email: Customerservice@worksofwisdom.co.uk

We are committed to complying with the terms of data protection legislation and to the processing of personal data in a lawful, fair and transparent manner. If, however, you believe that we have not complied with our obligations under data protection legislation, you have the right to lodge a complaint with your national supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so, please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF **CHANGES** 

We keep our privacy policy under regular review. This privacy policy was last updated in January 2024.

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

THIRD PARTIES

We always endeavour to deal with vendors and other third parties who are UK GDPR compliant or, in the case of third parties located outside the UK, who have adequate measures in place to safeguard the security of personal data. 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. We accept no liability howsoever arising for the content or reliability of these third

2

party websites or the data collection and use practices or security measures used by such third parties.

# THE DATA WE COLLECT ABOUT YOU

**Information you give us.** This is information about you that you give us by vising our stores or our website, purchasing products or services on our website, filling in forms on our website, registering an account, corresponding with us by phone, email, online chat, social media platforms or otherwise. It includes information you provide when you use our website or report a problem with our website.

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

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender and image.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes payment card details and VAT number.
- 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, how often you use the website and other performance data. We collect this data by using cookies, server logs and other similar technologies.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback, reviews and survey responses.
- Usage Data includes information about your visit to our website, including the full Uniform
  Resource Locators (URL), clickstream to, through and from our website (including date and
  time), products you viewed or searched for, page response times, length of visits to certain

pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

 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 policy.

While we can never guarantee that the transmission or processing of personal data is entirely risk free, especially the transmission of personal data over the internet, we are committed to ensuring personal data is processed in a lawful, fair, transparent and responsible way.

We do not require or collect any Special Categories of Personal Data about you.

# 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.

# **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;

- 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; and/or
- where we need to comply with a legal or regulatory obligation.

We have set out below, in a table format, 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.

purpose/activity	type of data	legal basis for processing
to register you as a new customer	<ul> <li>identity data</li> <li>contact data</li> <li>profile data</li> <li>marketing and communications data</li> </ul>	<ul> <li>performance of a contract</li> <li>legitimate interests in growing and developing our business.</li> </ul>
to provide the products and services, to process and deliver your order(s) using third party providers, to provide our Click & Collect service	<ul> <li>identity data</li> <li>contact data</li> <li>financial data</li> <li>transactional data</li> </ul>	performance of a contract

to manage payments, fees and charges, using third party acquirers where applicable (i.e. non-cash transactions) and collect and recover money owed to us	<ul> <li>identity data</li> <li>contact data</li> <li>profile data</li> <li>transactional data</li> </ul>	<ul> <li>performance of a contract</li> <li>legitimate interests in managing our business and recovering debts owed to us</li> </ul>
to manage our relationship with you, to notify you of changes to our terms and/or policies	<ul><li>identity data</li><li>contact data</li><li>profile data</li></ul>	<ul> <li>legitimate interests in growing and developing our business</li> <li>compliance with a legal obligation</li> </ul>
to enable you to take part in a prize draw, competition or complete a survey and/or review	<ul> <li>identity data</li> <li>contact data</li> <li>profile data</li> <li>marketing and</li> </ul>	<ul><li>consent</li><li>performance of a contract</li></ul>
	communications data	

to administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul> <li>usage data</li> <li>technical data</li> <li>identity data</li> <li>contact data</li> </ul>	<ul> <li>legitimate interests in growing and developing our business</li> <li>compliance with a legal obligation</li> </ul>
to deliver relevant website content and advertisements to you and	• identity data	• consent
measure or understand the effectiveness of the advertising we	• contact data	<ul> <li>legitimate interests in growing and</li> </ul>
serve to you	<ul> <li>transactional data</li> </ul>	developing our business and to
	• technical data	inform our marketing
	• profile data	strategy
	• usage data	
	• marketing and	
	communications data	
to use cookies and data analytics to improve our website,	• technical data	• consent
products/services, marketing	• usage data	legitimate interests in
customer relationships,		growing and
research/satisfaction surveys, and experiences.		developing our
сърспенсез.		business and to
		inform our marketing strategy

to make suggestions and recommendations to you about	• identity data	• consent
goods or services that may be of interest to you.	contact data	<ul> <li>legitimate interests in growing and</li> </ul>
merest to you.	transactional data	developing our
	technical data	products and services and our
	• usage data	business
	profile data	
	marketing and     communications     data	
to provide you with a copy of our annual toy catalogue and/or other	identity data	• consent
marketing communications.	• contact data	
	marketing and communications data	

to provide customer support and respond to your queries and/or provide you with information requested with assistance from our third party service providers	<ul> <li>identity data</li> <li>contact data</li> <li>technical data</li> <li>usage data</li> <li>profile data</li> <li>transactional data</li> </ul>	<ul> <li>legitimate interests in growing and developing our business</li> <li>performance of a contract</li> </ul>
to identify and prevent fraudulent transactions	<ul> <li>identity data</li> <li>contact data</li> <li>technical data</li> <li>financial data</li> <li>transactional data</li> </ul>	<ul> <li>compliance with a legal obligation</li> <li>legitimate interest in protecting our business and our customers</li> </ul>
to provide you with information about job opportunities	<ul><li>identity data</li><li>contact data</li></ul>	<ul> <li>performance of a contract in relation to potential job applicants</li> <li>legitimate interest in growing our business</li> </ul>

to carry out photoshoots and video	• identity data	• consent
footage for our marketing and advertising purposes	• contact data	
to publish and upload photographs and video footage on our website, social media platforms, TV, toy	• identity data	• consent
catalogue or other marketing		
materials		

## **MARKETING**

Where you have given us your consent or if you have previously purchased from us, we may use your information to contact you about products that you have purchased, to tell you about goods and services which we consider may interest you, our offers available from time to time, or to send you a copy of our annual catalogue. Our marketing communications may be provided to you by email, post or such other means as we choose. You have a right to object at any time to this use of your information by contacting us at customerservice@worksofwisdom.co.uk.

In addition to the right to object, you will also be provided with the opportunity to opt out of receiving these marketing communications both at the time that you provide your contact information to us and at any time afterwards by clicking on the relevant link provided in an email or SMS or by contacting us at any time at Customerservice@worksofwisdom.co.uk.

If you tell us that you do not want to receive any further marketing information from us, we will not contact you further for the purpose of marketing. However, we will not necessarily remove your information from our database(s) if it is necessary to retain the information for other non-marketing purposes such as where we need your information for compliance with our legal obligations. Please note that after you opt out of receiving marketing communications from us, it may take a few days to update our records during which time you may continue to receive marketing communications. Furthermore, your withdrawal of consent will not impact the lawfulness of processing based on your consent prior to the withdrawal.

We may also use web beacons in marketing emails sent to customers who have opted into our customer database. If you receive the HTML formatted version of our emails and your email is

configured to download images, a record of whether you open or click on the email is saved. This information may be used in aggregated form to allow us to understand the effectiveness of our emails. We may also use the information to publish more relevant content or to unsubscribe recipients who have not opened our emails for a certain period of time.

#### THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the Works of Wisdom company for marketing purposes.

#### **COOKIES**

This website uses cookies. Cookies are small text files which are stored by your browser on your computer or device and are normally used to gather statistical information and to analyse trends of use or access to a website. Cookies cannot be used to run programs or deliver viruses to your computer or device. We use cookies to collect such information as IP addresses, type of operating system, browser type, browser language, the history of queries, data concerning shows of advertising messages and users' clicks on them. Cookies may be used to save your personal preferences so you do not have to re-enter them each time you access our website. We also place cookies on your device when you interact with website technologies from third party providers, such as scripts, pixels and tags, which we integrate on our website for advertising purposes.

## **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 Customerservice@worksofwisdom.co.uk. 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.

# DISCLOSURES OF YOUR PERSONAL DATA

We may disclose your information to third parties if you consent to us doing so as well as in the following circumstances:

You agree that we have the right to share your personal information with the following recipients or categories of recipients:

- Selected third parties including:
  - any department or authorised person within the Group, or any member company within the Group;
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in relation to the provision of goods and/or services;
  - government agencies, authorities or departments for the purposes of complying with any security requirements or legal obligations; and
  - analytics and search engine providers that assist us in the improvement and optimisation of our website.
- We will disclose your information to third party recipients:
  - 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 our business or assets;
  - if all or substantially all of our business or assets are acquired by or transferred to a
    third party whether in the event of a merger, reorganisation, transfer of undertakings,
    receivership, liquidation or other winding up or other similar circumstances, in
    which case personal data held by us will be one of the transferred assets;
  - if we are under a duty to disclose or share your personal data in order to comply
    with any law, legal obligation or court order, or in order to enforce rights under the
    UK GDPR or other agreements; and

to protect our rights, property or safety and of our customers, or others. This
includes exchanging information with other companies and organisations for the
maintenance and security of our website and our business.

## INTERNATIONAL TRANSFERS

Personal data may be shared and/or transferred to our trusted partners and service providers who operate or maintain their servers outside of the UK, where the privacy and data protection laws may not be as protective as those in the UK. This is only for the purposes of providing, and to the extent necessary to provide the services to you. There are special requirements set out under Chapter V of the GDPR (with which we would comply) to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer.

# **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 or supervisory authority of a breach where we are legally required to do so.

#### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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. This means that the period of time for which we store your personal data may depend on the type of data we hold.

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. This may vary according to legal requirements and other regulatory requirements in a particular country.

# YOUR PERSONAL DATA AND YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Any such request should be submitted to us in writing and sent to customerservice@worksof wisdom.co.uk.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information 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, if applicable, at the time of your request. To do so at any time, please contact us by email at customerservice@worksofwisdom.co.uk.

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. To exercise your right to object at any time, please email Customerservice@worksofwisdom.co.uk. Should you object, we will no longer process your personal data for these purposes unless doing so is justified by a compelling legitimate ground as described above.

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 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.

# 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 may 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 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.

#### PERSONAL RIGHTS

The rights described in this section are personal rights and are exercisable only by the individual person (or data subject) concerned.