

## Customer Privacy Notice

### Introduction

Level Developments Ltd respects your privacy and is committed to protecting your personal data. This notice is intended to inform you how we look after your personal data and about your privacy rights and how the law protects you.

### Purpose

This privacy notice seeks to give you information about how we collect and process your personal data, including any data you may provide through our website when you purchase a product.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

### Controller

Level Developments Ltd is the data controller and responsible for your personal data.

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this privacy notice. If you have any questions or you would like to exercise your legal rights (see below) please contact the DPO using the details set out below.

### Contact Details

Sarah Metcalf, Director  
Level Developments Ltd  
Spencer Place, 97-99 Gloucester Road, Croydon, CR0 2DN

sarah@leveldevelopments.com  
+44 (0) 20 8684 1400

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](http://www.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 Privacy Notice

We may need to make changes to this Privacy Notice from time to time. We will let you know of any material changes to this notice.

### Informing us of changes

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

Our website may include links to third-party websites. 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.

## The data we collect about you

Personal data is any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

We may collect, use, store and transfer different kinds of personal data about you. We have grouped the types of data below:

- **Identity Data:** this includes data such as your title, first name, last name.
- **Contact Data:** this includes data such as your billing address, delivery address, email address and telephone numbers.
- **Financial Data:** this includes data such as your bank account details. Payment card details are requested via a secure 3<sup>rd</sup> party platform linked to website orders only. We do not ask for card details other than via this secure method. Data may be obtained from credit reference agencies or Companies House.
- **Technical Data:** this includes data such as your IP address, login details, browser type, operating system.
- **Transaction Data:** this includes data such as details about payments to and from you and other details of products and services you have purchased from us.
- **Profile Data:** this includes purchases or orders made by you.
- **Usage Data:** this includes information about how you use our website, products and services.
- **Marketing and Communications Data:** this includes your preferences about receiving marketing from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data as it 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

If you do not provide personal data about you that we need to know, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel your order.

## How is your personal data collected?

We principally collect data from and about you through our direct interactions with you. You may give us your contact, identity and financial details when you place an order with us, by filling in forms or by corresponding with us by post, phone, email or otherwise about an order, or when creating an order on our website. We may also collect data from you when you browse our website, such as through the use of cookies.

## 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.
- Where we need to comply with a legal or regulatory obligation.

Generally speaking we do not rely on consent as a legal basis for processing your personal data other than in relation to 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.

We have set out below a description of the ways we plan to use your personal data, and which of the legal basis 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> <li>◦ Identity</li> <li>◦ Contact</li> </ul>	<ul style="list-style-type: none"> <li>◦ Performance of a contract with you</li> </ul>
To process and deliver your order including: <ul style="list-style-type: none"> <li>◦ Manage payments, fees and charges</li> <li>◦ Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>◦ Identity</li> <li>◦ Contact</li> <li>◦ Financial</li> <li>◦ Transaction</li> </ul>	<ul style="list-style-type: none"> <li>◦ Performance of a contract with you</li> <li>◦ Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>◦ Notifying you about changes to our terms or privacy notice</li> </ul>	<ul style="list-style-type: none"> <li>◦ Identity</li> <li>◦ Contact</li> <li>◦ Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>◦ Performance of a contract with you</li> <li>◦ Necessary to comply with a legal Obligation</li> <li>◦ Necessary for our legitimate interests (to keep our records updated)</li> </ul>
To administer and protect our business and our website	<ul style="list-style-type: none"> <li>◦ Identity</li> <li>◦ Contact</li> <li>◦ Technical</li> </ul>	<ul style="list-style-type: none"> <li>◦ Necessary for our legitimate interests (such as running our business, providing administration and IT services, to prevent fraud)</li> <li>◦ Necessary to comply with a legal obligation</li> </ul>

## Cookies

Cookies are used on our website to keep track of the contents of your shopping cart, to store delivery addresses if the address book is used and to store your details if you select the "Remember Me" function. They are also used after you have logged on as part of that process. You can turn off cookies within your browser by going to "tools/internet options/privacy" and selecting the option to block cookies. If you turn off cookies you will be unable to place orders or benefit from the other features that use cookies. Data collected by this site is used to (a) take and fulfill orders (b) administer and enhance the site and service (c) disclosure to third parties for the purpose of delivering goods.

## 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 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

The Company does not disclose your data to third parties other than when details are processed as part of the order fulfillment. As part of this, we may disclose your data to the following:

- Sage Pay Europe Limited - for the purposes of processing secure payment for delivering your order to you.
- PAYPAL (EUROPE) S.À.R.L. ET CIE, S.C.A. - for the purposes of processing secure payment for delivering your order to you.
- FedEx UK – courier service for the purpose of delivery of goods worldwide
- UPS - courier service for the purpose of delivery of goods worldwide
- DHL Express - courier service for the purpose of delivery of goods worldwide
- TNT Express - courier service for the purpose of delivery of goods worldwide
- ILG – Logistics service for the purpose of arranging delivery of goods worldwide
- Rico Logistics – UK Sameday courier service

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.

## International Transfers

We do not transfer your personal data outside the European Economic Area ("EEA").

## 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, or it being altered or disclosed. In addition, we limit access to your personal data to those 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.

## 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 and financial data) for six years after they cease being customers.

## Your Legal Rights

In certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are as follows:

- To request access to your personal data (commonly known as making a “data subject access request”).
- To ask for incomplete and incorrect personal data we hold about you to be corrected.
- To ask for your personal data to be deleted in some circumstances.
- To object to the processing of your personal data in some circumstances.
- To ask for the processing of your personal data to be restricted in some way.
- To ask for your personal data to be transferred to a third party.
- To withdraw your consent to your personal data being processed (where consent is applicable).

If you want to exercise any of the above rights, please contact Sarah Metcalf (see contact details at paragraph 4)

## Data Subject Access Request

You will not usually 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.

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 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.