

## Relyon Limited (“Relyon”) - Data Protection Customer Privacy Notice

Relyon takes its obligations with regard to data protection seriously. As such, we are providing this notice (“**Privacy Notice**”) to you so that you are provided with information about how Relyon collects and uses your personal data in accordance with applicable data protection law, including the General Data Protection Regulation 2016/679 (“**GDPR**”). Please read this Privacy Notice, as it contains important information of which you should be aware.

For the purposes of this Privacy Notice, “**Relyon Customers**” (“**you**” or “**your**”) means customers of Relyon and “**Relyon**” (“**we**”, “**us**” or “**our**”) means Relyon Limited (a company incorporated in the UK with a registered office address), and refers specifically to the Relyon company from which you purchase goods [and/or services] (or to which you make an enquiry).

Relyon is the data controller with regard to the processing of your Personal Data (as defined below). [The data controller is the entity that determines how and why personal data is processed.

This policy applies only to personal information processed by or on behalf of Relyon. Where our website contains links to other sites, we have no influence on whether or not they comply with data protection law. You should check their own privacy policies before providing them with personal information.

### 1. What do we collect and process?

In order for Relyon to deliver its products and services to you and manage its business efficiently, it is necessary for us to collect, maintain and process personal data about you. “**Personal Data**” is information which (either on its own or in combination with other information Relyon holds) allows Relyon to identify a Relyon Customer and thus enable us to manage our relationship with Relyon Customers. We may collect information from you when you visit our website, purchase goods or services from us, contact us by telephone, email or post or receive a communication from us relation to your purchase.

The Personal Data which we process may include the following:

- Name and address
- Contact information (including telephone number and email address)
- Bank account and payment card details and billing address
- Age/Date of birth
- Gender
- Current and Past purchases and orders made by you
- [Your password(s) for our websites]
- [your communication and marketing preferences]
- [your interests, preferences, feedback and survey responses]
- [your location]
- [the personal data contained in any other communication you make with us]
- [your online browsing activities on Relyon websites]

Personal Data will primarily be collected from you directly. However, some Personal Data may, where lawful to do so, be collected by Relyon from third parties or publically available information about you [(e.g. from marketing agencies)]. We will only accept and use information about you from reputable organisations who have either obtained your permission to share your information with us or who have collated information about you from publicly available sources.

Please note that you are under no obligation to provide Relyon with your Personal Data, however, not providing some of the personal data described above could prevent Relyon from performing its obligations in relation to your purchase of goods [and services] (and any related services) from us.

### 2. Do we process Sensitive Personal Data?

In addition to Personal Data, Relyon may also process information about you which is classified as sensitive (“**Sensitive Personal Data**”). Examples of Sensitive Personal Data include the following:

- [Racial or ethnic origin
- Religious beliefs or other beliefs of a similar nature
- Sexual preference
- Political opinions
- Trade union membership
- Physical or mental health or condition
- Criminal offences or allegations]

Your Sensitive Personal Data will be processed as explicitly set out in this Privacy Notice but may be processed inadvertently for other purposes described below.

**3. Why and for what purpose do we collect and use your Personal Data and Sensitive Personal Data and what is our lawful basis for doing so?**

**Please note:** this list may be updated from time to time and we will provide notice as and when such updates are made.

The term “**processing**” means *any* action taken, also with the help of electronic means, in connection with Personal Data, including collection, handling, use, transfer and disclosure by transmission, dissemination or otherwise making available, as well as recording, organisation, storage, retention, adaptation or alteration, access, retrieval, consultation, alignment or combination, blocking, anonymising, erasure, disposal or destruction.

Personal Information	Basis of Processing	Purposes of Processing
<ul style="list-style-type: none"> <li>• Name and address</li> <li>• Contact information (including telephone number and email address)</li> <li>• Bank account and payment card details and billing address</li> <li>• Details of your purchase or order</li> <li>• Personal data contained in any other communication you make with us</li> </ul>	Processing that is necessary <b>to perform a contract</b> or when taking steps in connection with a contract with you.	<ul style="list-style-type: none"> <li>(a) to help us identify you</li> <li>(b) to provide the goods [and/or services] purchased by you and provide any related services or follow-up service or information as required</li> <li>(c) to process your payment(s) to us</li> </ul>
<ul style="list-style-type: none"> <li>• Personal information provided voluntarily by you</li> </ul>	Where necessary, processing based on your freely given, specific, informed and unambiguous <b>consent</b>	<ul style="list-style-type: none"> <li>(a) to send marketing information and surveys to you by email, post and text</li> <li>(b) to keep you updated on Steinhoff products and services which may be of interest or relevance to you</li> </ul>
<ul style="list-style-type: none"> <li>• Name and address</li> <li>• Contact information (including telephone number and email address)</li> <li>• Bank account details</li> </ul>	Processing that is necessary <b>to comply with a legal obligation</b> to which we as the data controller are subject (other than a contractual obligation).	<ul style="list-style-type: none"> <li>(a) to provide products and services</li> <li>(b) to process customer’s queries</li> </ul>

**Personal Data – Legitimate Interests**

Personal Information	Basis of Processing	Purpose of Processing	Balancing Test
<ul style="list-style-type: none"> <li>• Details of current and past purchases and orders and purchased made by you</li> </ul>	Processing that is necessary <b>for our own legitimate interests</b> or those of third parties provided these are	<ul style="list-style-type: none"> <li>(a) to respond to and/or deal with requests, enquiries or complaints</li> <li>(b) for managing our</li> </ul>	<ul style="list-style-type: none"> <li>(a) required to process customers request, enquiry or complaint</li> <li>(b) to process and fulfil customer</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Age/Date of birth</b></li> <li>• <b>Nationality</b></li> <li>• <b>Gender</b></li> <li>• <b>Personal data contained in any other communication you make with us</b></li> <li>• <b>[Your password(s) for our websites]</b></li> <li>• <b>[your communication and marketing preferences]</b></li> <li>• <b>[your interests, preferences, feedback and survey responses]</b></li> <li>• <b>[your location]</b></li> <li>• <b>[the personal data contained in any other communication you make with us]</b></li> <li>• <b>[your online browsing activities on Steinhoff websites]</b></li> </ul>	<p>not overridden by your interests and fundamental rights and freedoms</p>	<p>business</p> <ul style="list-style-type: none"> <li>(c) for marketing purposes</li> <li>(d) for the prevention and detection of crime</li> <li>(e) for statistical purposes</li> <li>(f) for improving and changing our services and processes</li> </ul>	<p>orders</p> <ul style="list-style-type: none"> <li>(c) In order to respond to customer's requests for information and samples</li> <li>(d) to ensure compliance with current legislation</li> <li>(e) Personal data not used for statistical purposes</li> <li>(f) personal data not used for the improvement of services or processes</li> </ul>
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[We may convert your personal data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct research and analysis, including to produce statistical research and reports. We may share such anonymous aggregated data with third parties. Aggregated and anonymous information does not personally identify you and is therefore not personal data.]

#### 4. To whom will your Personal Data be disclosed?

Personal data will be shared and transferred from us to other Steinhoff Manufacturing group companies for the purposes noted above (or for such other purposes as are notified by Relyon to you from time to time).

Relyon may otherwise disclose Personal Data to third parties that are performing services under contract for Relyon, such as IT hosting and/or maintenance providers. Personal Data may also be disclosed upon lawful request by government authorities, law enforcement and regulatory authorities, where required or permitted by relevant local law and/or for tax or other purposes. Further, Personal Data may be disclosed to third parties in response to legal process and when required to comply with laws, or to enforce Relyon's agreements and corporate policies or to protect the rights, property or safety of Relyon, its employees, agents and/or others, as well as to parties to whom the relevant Relyon Customer has authorised Relyon to release his Personal Data.

For the purposes described above (or for such other purposes as are notified by Relyon to you from time to time), your personal information may be transferred to, and stored, and otherwise processed in, one or more countries outside of the European Economic Area ("EEA"). The jurisdiction of other organisations outside the EEA may not have adequate data protection laws equivalent to those in place within the EEA. For transfers of your personal data to third parties outside of the EEA, we take additional steps in line with data protection laws. We have implemented appropriate technical and organisational measures to protect your personal data in the form of [EU Commission approved forms of contract] with the relevant recipient(s) of your personal information. In addition, we will take reasonable steps to ensure that your personal information is adequately protected in accordance with the requirements of the UK data protection law. If you would like to obtain a copy of the [EU Commission approved forms of contract], please contact us by using the details below.

Relyon may also, where permitted (and having obtained any necessary consents as may be required by law), disclose Personal Data outside of the EEA for the purposes noted above in respect of Relyon, or:

- where required as matter of law (for example, to tax and social security authorities);
- where required to protect Relyon's and/or other Steinhoff Manufacturing group companies' legal rights (for example, to defend against litigation);
- for such other purposes as are notified by Relyon from time to time.

## 5. Security of your Personal Data

As stated above, Relyon takes the protection of your Personal Data seriously and we have implemented technical, physical and organisational measures to ensure the Personal Data (and Sensitive Personal Data) of Relyon Customers is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

## 6. Data Retention

Relyon will retain your personal data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that personal data will be retained for the duration of the time that we provide goods [and services] to you and then for a reasonable time thereafter in order to manage any problems, process any returns, manage our relationship with you, defend any claims, for tax purposes and/or for any other record keeping purposes. This period is typically a period of not less than 6 years from the date of your initial contact with us.

## 7. Your Rights

You may withdraw your consent to receiving marketing at any time by contacting us using the contact details below.

We offer the following rights to you in respect of your personal data:

1. You may request access to or copies of the personal information that we hold about you. If you would like to exercise this right, please contact us using any of the contact details given below. If your request is made before 25 May 2018, we may charge you a fee of £10 for such access, and in some circumstances more for the provision of copies.
2. In certain circumstances you may request that we provide a copy of your personal data in a machine readable format. However, this right can only be exercised in respect of personal data about you processed by automated means either where you have provided your consent or where it is necessary for the performance of a contract with you (as set out above).
3. If you believe that any information we have about you is incorrect or incomplete, please contact us using any of the contact details given below as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the information we hold is inaccurate;
4. You may request details of the source of the information we hold on you, including whether it came from publically accessible sources;
5. You may object to how we process your personal data;
6. You may request that your personal information be deleted, where it is no longer necessary for the purposes for which it is being processed and provided there is no other lawful basis for which we may continue to process such information;
7. If we are processing your personal information to meet our legitimate interests (as set out above), you may object to the processing of your personal information by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your personal information for those purposes;
8. You may withdraw any consent given to processing (this will not affect the lawfulness of processing based on consent before its withdrawal); or
9. If we are processing your personal information automatically for the purposes of performing our contract with you, you may have the right to request that the personal information we hold about you be transferred to a third party data controller.

You may also request that we restrict the processing of your data to that to which you have consented or for the establishment, exercise or defence of legal claims or the protection of the rights of another person, whilst we verify your data as set out in point

2 above; pending verification of our legitimate grounds as set out in point 6 above; or if the processing is unlawful or no longer necessary, but you wish us to retain your data for the purposes of establishing, exercising or defending legal claims.

If you would like to exercise any of your rights as described above (or if you have any questions about this Privacy Notice or concerns about our dealings with your personal data), please contact [GDPR@steinhoff.co.uk](mailto:GDPR@steinhoff.co.uk)

We will try to resolve any concerns you may have. However, if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>). You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

## **8. Updates to this Privacy Notice**

Relyon may change this Privacy Notice from time to time in order to reflect changes in the law and/or its privacy practices. When this happens and where Relyon is required to do so by law, it will provide you with a new and/or updated Privacy Notice detailing how the use of your Personal Data is changing and, if necessary, obtaining your consent for the further Processing, as may be applicable.

Policy last updated: May 2018