

brandarchitekts

Brand Architekts Group PLC

Privacy Policy

Introduction

Welcome to the Brand Architekts Group PLC privacy policy.

Brand Architekts Group PLC respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is divided into the following sections:

1. Important information and who we are
2. Our collection and use of your personal data
3. Transferring your personal data out of the UK
4. Cookies
5. Marketing
6. Your rights
7. How long your data will be kept
8. Keeping your personal data safe
9. How to complain
10. How to contact us
11. Changes to this privacy policy

1. Important information and who we are

Brand Architekts Group PLC is registered in England and Wales under company number (01975376) with our registered office at 8 Waldegrave Road, Teddington, London, TW11 8GT (collectively referred to as "Brand Architekts", "we", "us" or "our" in this privacy policy).

We are an AIM listed Beauty Brands business, specialising in the delivery of innovative and exciting new products to consumers and retailers.

We collect, use and are responsible for certain personal data about you. When we do so, we are regulated by the UK GDPR and the EU GDPR. We are responsible as 'controller' of that personal data for the purposes of those laws.

Purpose of this privacy policy

This privacy policy aims to give you information on how Brand Architekts Group PLC collects and processes your personal data through your use of this website, including any personal data you may provide through using this website.

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

It is important that you read this privacy policy carefully when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

This privacy policy relates to your use of our website, (<https://www.brandarchitektsplc.com/>) (the “**Website**”) and how we collect personal data about you.

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 personal 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.

2. Our collection and use of your personal data

How your personal data is collected

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

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

- Analytics provides i.e. Google Analytics; and
- Advertising networks i.e. Teads.

The personal data 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 personal data about you which we have grouped together as follows:

- **Identity Data** includes your full name and title;
- **Contact Data** includes email address and telephone numbers;

- **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;
- **Usage Data** includes information about how you use our Website; and
- **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 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 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).

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 personal 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 products). In this case, we may not be able to communicate with you effectively (e.g. to deal with your product enquiry), but we will notify you if this is the case at the time.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a lawful basis for doing so, for example:

- **Consent:** where you have given us clear consent for us to process your personal data for a specific purpose;
- **Contract:** where our use of your personal data is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **Legal obligation:** where our use of your personal data is necessary for us to comply with the law (not including contractual obligations); or
- **Legitimate interests:** where our use of your personal data is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal data which overrides our legitimate interests).

The table below explains what we use (process) your personal data for and why:

Purpose/Activity	Type of data	Our reasons for processing your personal data and the lawful basis for processing including basis of legitimate interest
To promote our goods to you.	(a) As set out in “the data we collect about you” section.	(a) To promote our goods to you, with a view to entering into an agreement with you.
Responding to enquiries	(a) Identity (b) Contact (c) Marketing and Communications	(a) To respond to enquiries sent to us via e-mail, post or through our ‘Contact Us’ section on our Website. (b) Necessary for our legitimate interests in order respond to your enquiries.
Sending communications to you including notifying you of our products, terms or privacy policy or asking you to leave a review or take a survey.	(a) Identity (b) Contact (c) Marketing and Communications	(a) To maintain our relationship with you in accordance with the terms agreed between us. (b) Necessary for our legitimate interests in order for us to keep our records updated and to study how customers use our products. (c) Consent
User generated content (e.g. through the “Contact” section of our Website via the message function) – We do not add such content to any form of database, however we would use such information to follow up any queries you might have.	(a) Identity (b) Contact (c) Marketing and Communications (d) Usage	(a) To deal with any queries or complaints you might have. (b) Necessary for our legitimate interests in order to respond to your queries and communicate with you.

Purpose/Activity	Type of personal data	Our reasons for processing your personal data and the lawful basis for processing including basis of legitimate interest
Social media channels – You can engage with us via social media services such as LinkedIn. When you engage with our content posted or if you contact us, you may provide personal data to us.	<p>You may provide us with certain personal data available in your profile such as:</p> <ul style="list-style-type: none"> (a) Identity (b) Contact <p>You might also provide ID related to the social media platform.</p>	<ul style="list-style-type: none"> (a) To communicate with you by replying to any of your comments or dealing with a message sent to us. (b) Necessary for our legitimate interests to improve the promotion of our goods to you.

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.

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.

3. Transferring your personal data out of the UK

To provide products to you and to make our website available, it is sometimes necessary for us to share your personal data outside the UK, for example, with our service providers that are either themselves located outside the UK, or that engage sub-processors which are located outside of the UK to assist them in providing services to us.

Transfers of personal data outside of the UK are subject to special rules under UK data protection law. This is because non-UK countries do not have the same data protection laws as the United Kingdom.

As a result, when we transfer personal data outside of the UK we will ensure that the transfer complies with data protection law by following one of the below steps:

- Confirming that the recipient is located in a country which has been deemed to provide personal data with an adequate level of protection, for example countries located within the EEA.
- Putting in place safeguards such as approved standard contractual clauses so that you have enforceable rights and effective legal remedies.
- Confirming that a specific exception applies under data protection law.

4. Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our Website. Cookies help us recognise you and your device and store

some information about your preferences or past actions in order to provide you with a more personalised user experience.

For further information about cookies, use of cookies, when we will request your consent before placing them and how to disable them, please see our [cookie policy](#).

5. Marketing

We would like to send you information about products, and special offers which may be of interest to you. We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

We will get your express opt-in consent before we 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 the Website 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.

6. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including

	profiling) that produces legal effects concerning you or similarly significantly affects you.
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For further information about your rights please contact us or see the guidance provided by the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of your rights, please:

- email, call or write to us — see the 'How to contact us' section at the end of this policy;
- let us have enough information to identify you e.g. your full name, address and customer or matter reference number);
- let us have proof of your identity (a copy of your driving licence or passport), if requested; and
- let us know which right you want to exercise and the data to which your request relates.

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.

7. How long your data will be kept

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.

In some circumstances you can ask us to delete your data: (see '**Your rights**' above for further information).

In some circumstances we will 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.

8. Keeping your personal data safe

We have appropriate security measures to prevent your personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so in an authorised manner and are subject to a duty of confidentiality.

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

9. How to complain

Please contact us if you have any query or concern about our use of your data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the ICO. The ICO may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

10. How to contact us

Our contact details
FAO: Data Manager The Brand Architekts Limited 8 Waldegrave Road, Teddington, TW11 8GT Email: digital@brandarchitekts.com

11. Changes to this privacy policy

This privacy policy was last updated in May 2022. We keep our privacy policy under regular review to make sure it is up to date and accurate. If we change our privacy policy from time to time, we will post the details of any changes here. We may also take reasonable steps to notify you if such changes affect how your personal data is processed.