

PRIVACY POLICY

By registering, using or subscribing to the Services, you confirm that you have read and consent to:

- the collection of your personal data as described in this Policy (including, for example, your contact information, age and gender);
- the processing of your personal data, including your sensitive data as described in this Policy;
- the sharing of personal data with third parties as described in this Policy;
- the storage and processing of your personal data in the United Kingdom (and other countries) as described in this Policy;
- the use of cookies and similar technologies to store and access information on devices you connect to the Services;
- the collection and use of location information as described below
- Where relevant, the transfer of your data to countries outside of the EU, including the United States.

If you have any questions relating to the content of this Policy, please contact us using the contact information set out below.

IMPORTANT INFORMATION

WHO WE ARE AND OUR ROLE

This Policy is issued on behalf of the Paperbag Designs so when we mention “Paperbag Designs”, “we”, “us” or “our” in this Policy, we are referring to Paperbag Designs.

Paperbag Designs is the controller and primarily responsible for the Services.

We have appointed a Data Protection Officer (“DPO”) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out in the Contact Us section below.

AGE RESTRICTIONS

We restrict the use of our Services to individuals age 18 and above. We do not intentionally collect or maintain personal data from children under the age of 16. If you become aware that personal data about a person under 16 has been provided to us, please immediately contact us using the details below.

THIRD-PARTY CONTENT AND LINKS

The Services may include content or links from 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.

THE DATA WE COLLECT ABOUT YOU AND HOW IT IS COLLECTED

Personal data 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).

WHAT WE COLLECT AND HOW

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

a. **Information You Provide.** When you register, use or subscribe to any of our Services we may collect a variety of information, including:

- **Contact Information** such as your name, email address, phone number, and address (“Contact Information”);
- **Other Information** such as birth date, password, billing information, credit card information, gender, age, and any other information you share with the Services. We may collect billing or payments information if you engage with a paid Service.

b. Information About How You Use the Services. We may collect information about your participation and actions on the Services. This may include information such as the pages you view and how you browse the Services.

c. Information Automatically Collected. When you access our Services, we and our third party partners automatically record information from your device and its software, such as your IP address, browser type, Internet service provider, platform type, the site from which you came and the site to which you are going when you leave our website, date and time stamp and one or more cookies that may uniquely identify your browser or your account. When you access our Services using a mobile device, we may also receive or collect identification numbers associated with your device (such as a unique device ID, IDFA, Google AdID), device type, model and manufacturer, mobile device operating system brand and model, mobile carrier, phone number, email address, and other apps that you have downloaded. We also collect information about your usage of, and activity on, our Services, including internet navigation details (for example, how your mouse moves on a screen which tells us if you're a bot or real person).

d. Cookies and Similar Technologies. We and our third party partners may use cookies and similar technologies, including those from third parties, to collect, analyse and store information, to provide customized advertising on our site and applications and on other sites or applications, to provide and improve the Services or other products or services offered by Paperbag Designs, and to identify and prevent fraudulent activities.

e. Location Data. We do not currently collect and store your precise geolocation or precise latitude or longitude coordinates for you. Some of the information we collect, for example an IP address, can sometimes be used to approximate a device's location. In some cases, we assign the latitude and longitude of the centre of a city or state on record for you to your profile as a way to improve our analytics and matches for you.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where you do not provide the personal data detailed in this Policy, we may not be able to provide you with the Services.

HOW WE USE YOUR PERSONAL DATA

Generally, 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 for the Services.
- Where you have given consent for us to use your personal data and your sensitive personal data to provide certain Services (you may withdraw your consent for some uses of the data at any time by Contacting Us).
- 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.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out in the table below a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Please Contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one legal basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member	(a) Profile Data, such as name and age (b) Contact Data such as email address, phone number, or social media user account, as limited by your privacy settings (c) Data from Social Networking Sites (If you use Facebook or Google to log-in to the Paperbag Designs Services), including any interests or other data imported from your Social Networking Sites (d) Technical Data, such as device ID or IP Address, including timestamps	(a) Performance of a contract with you (b) With your consent in the case of sensitive personal data.
To enable you to partake in a prize draw, competition or complete a survey	(a) Profile Data (b) Contact Data (c) Usage Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use

	<p>(d) Any information, content, or submissions required as set forth in the contest rules when published</p>	<p>our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business, the Paperbag Designs Services, this website and your personal data (including security, fraud, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Profile Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Communications Data (f) Third Party Data provided to us by trusted partners, including proprietary scores, red flags, demographic information, usage data, and other information used to determine whether a Paperbag Designs account is being used improperly, accessed by an unauthorized third party, or represents a security or fraud risk to the Paperbag Designs community</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, cybersecurity, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Device ID (b) IP Address (c) Location (at country, state, city, or postal code level) (d) Gender</p>	<p>(a) 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)</p>

	<p>(e) Age</p> <p>(f) Technical Data such as OS version, hardware type, software type.</p> <p>(g) Cookies, pixels, or advertising tags</p> <p>(h) Usage Data</p>	<p>(b) With your consent for targeted advertising and profiling to serve more accurate advertising content to you.</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Profile Data</p> <p>(b) Usage Data</p> <p>(c) Technical Data</p> <p>(d) Communications Data</p>	<p>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)</p>
<p>To respond to requests from law enforcement</p>	<p>(a) Profile Data</p> <p>(b) Transaction Data</p> <p>(c) Usage Data</p> <p>(d) Communications Data</p> <p>(e) Location Data (at country, state, city, or postal code level)</p> <p>(f) Technical Data</p> <p>(g) Any other information we are compelled to provide by law</p>	<p>Necessary to comply with our legal obligations</p>

MARKETING

Where you have interacted with us, we will send you marketing communications from time to time. Such marketing communications are usually sent by email. If you do not want to receive such marketing communications, you have the opportunity to inform us by selecting certain boxes when we collect your personal data.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may choose to opt out of receiving marketing communications from us at any time by contacting us here. You may also select the “unsubscribe” link in the communication we send to you.

When you receive communications from Paperbag Designs including marketing communications, we may share your personal data with third party companies who help us conduct marketing activities. For example, we may use a third party to help us send email messages to you and help us understand how you have interacted with that email.

CHANGE OF PURPOSE

We will generally only use your personal data for the purposes for which we collected it.

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 share your personal data with the parties set out below for the purposes in the table above.

- Technology Services Providers, including infrastructure partners, customer support service providers, analytics service providers, cybersecurity partners, anti-fraud analytics companies, payment providers, chargeback representation services and similar partners.
- Advertising networks and technology companies, including Google, Facebook, and Twitter, and companies that measure advertising performance and attribution.
- Third parties, including consultants, who we engage to provide services on our behalf or to jointly provide services to you, including but not limited to contests and sweepstakes, marketing outreach and analytics, customer support, safety checks, and payment services.
- Social Networks, such as Facebook and Google+, where you have given permission to do so or where you have used your social network account to log-in to Paperbag Designs. If you have chosen to do this, your data will be governed by the privacy policy of that social network.

- to, in our discretion, (i) satisfy any applicable law, regulation, subpoena/court order, legal process or other government request, (ii) enforce our Terms of Use Agreement, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third party claims or allegations, (iv) protect against harm to the rights, property or safety of Paperbag Designs, its users or the public as required or permitted by law and (v) detect, prevent or otherwise address criminal (including fraud or stalking), security or technical issues.

- In connection with any company transaction, such as a merger, sale of assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy, dissolution, divestiture or any related or similar proceedings.

We require third parties to respect the security and privacy of your personal data and to treat it in accordance with the law. The majority of the third parties we share your personal data with are service providers that are permitted to process your personal data for specified purposes and in accordance with our instructions only. Some third parties will process your personal data for their own purposes as data controllers; please refer to their privacy policy which applies to their processing of your personal data. We are not responsible for those third parties.

INTERNATIONAL TRANSFERS

The personal data we collect from you may be transferred to, and stored in the United States of America and other countries. If you are located in the European Union or other regions with laws governing data collection and use that may differ from E.U. law, please note that we may transfer information, including personal data, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of your personal data to the U.S. or any other country in which Paperbag Designs or its parent, subsidiaries, affiliates or service providers maintain facilities, and the use and disclosure of information about you as described in this Privacy Policy. Paperbag Designs will take reasonable measures to help protect your personal data in an effort to prevent loss, misuse and unauthorized access, disclosure, alteration or destruction and to treat it in accordance with this Policy.

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA to a country that is not considered by the European Commission to offer an adequate level of protection for personal data, we do so using the following mechanisms:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or

- 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.

DATA SECURITY

At Paperbag Designs, we strongly believe in protecting your privacy. As a result, we have put in place reasonable security measures to help prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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. We work hard to ensure that the third parties we do provide access to your personal data to, such as our technology service providers like Amazon Web Services, also have reasonable security measures in place.

No platform, service, or method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security. We work hard to keep evolving our security measures to keep up with the bad actors and other threats of the world to help protect your personal data.

We may also share your personal data, including your payment transactions and activities on the Paperbag Designs Services, with third party partners for security and fraud prevention purposes. These partners collect, process and analyse such data for the purpose of helping their customers to identify and prevent fraud. 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

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will retain your personal data for as long as necessary to fulfil the purposes we collected and/or processed 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 unauthorized 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.

We also retain backups of the Paperbag Designs Services, including your personal data, on a rolling basis according to our internal data retention, disaster recovery, and business continuity policies. Our backups are stored off-site in the United States and in secure facilities in order to help ensure the protection of your personal data and the Services.

YOUR LEGAL RIGHTS

You may have certain rights under applicable data protection laws in relation to your personal data. As examples, 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.
- 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 legal reasons which will be notified to you, if applicable, at the time of your request.
- 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 overriding legitimate grounds to process your information which override your rights and freedoms.
- 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 accuracy of the personal data; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need the personal data for the purposes set out above, but we are required by you for the establishment, exercise, or defense of 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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Services to you. We will advise you if this is the case at the time you withdraw your consent.

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 will 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 does not have a right to receive it. We may also contact you to ask you for further information in relation to your request.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within thirty (30) days. Occasionally it may take us longer 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.

CONTACT US

Our full details are:

Paperbag Designs
33 Wenlock Walk
Grassmoor
Chesterfield
Derbyshire
S42 5BJ
United Kingdom
Email: info@paperbagdesigns.co.uk

You have the right to make a complaint at any time to the applicable data protection authority in your country. We would, however, appreciate the chance to deal with your concerns before you approach the authority so please contact us in the first instance.