

## SECURITY & PRIVACY WHO WE ARE

Monsoon Brands Limited is the owner of the website and responsible for any personal information you submit via our website or otherwise provide to us in store or by talking to our customer services team. We are a retail clothing company selling in specialised stores and online. We are an English company with registered company number 12543476 and our registered office is at 1 Nicholas Road, London, W11 4AN. We are notified with the UK Information Commissioner's Office under registration number ZA762294, and are regulated by the ICO. If you have any complaints about our security or handling of your personal data which we haven't been able to resolve with you via our customer services team - <https://help.monsoon.co.uk/hc/en-gb/requests/new> , you can contact the ICO at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by calling their helpline on 0303 123 1113.

## KEEPING YOU SECURE ONLINE

When you shop with us online for the first time we'll ask you for certain information (such as your email address, name, address if you register an account or for a reward card, and where you purchase a product, your payment details) to make sure that your order and delivery go smoothly. Any information you hand over reaches us fully encrypted through an SSL – a special security layer added to your account and checkout pages. You can see when you're on a secure page, because the address in your browser will begin with https instead of http. And you can sleep easy, because your credit card details are processed in the UK.

## SECURE PAYMENTS VERIFIED BY VISA & MASTERCARD SECURECODE

You can register with Visa and Mastercard Securecode through your card issuing bank. It will bring up an extra security window after you check out that requires you to input digits from a pass code that you'll have set with your bank.

## PAYPAL

When you choose to pay with Paypal, your financial information isn't even shared with us – Paypal handle the entire thing.

## KEEPING YOUR PASSWORD SAFE

Remember to keep your Monsoon account password safe! We can help you to reset it now and then, but you'll need to make sure that it stays with you and only you. Giving it out can represent a security risk and Monsoon Brands Ltd will not be liable for any loss or damage that might arise from this. - 2 - 92971/163/4541740-v0.2

## HOW WE COLLECT YOUR INFORMATION

Our primary goal in collecting personal information from you is to assist your purchase and to allow us to provide and suggest products that might interest you. In order to do this personal information may be collected from you in the following ways:

- Information you voluntarily provide to us.
  - o We collect information when you register or create an account, register for our reward card, consent to us sending you an e-receipt, ask to sign up for our newsletters and marketing, during the course of email exchanges with us and as part of any customer support interactions.

o The information we collect includes name, email, date of birth, address and telephone number, and where you purchase products online other than through Paypal, your payment details.

- Information we collect through your use of our website.

o We may collect through our use of cookies, pixels, beacons, log files and other technologies personal information regarding your mobile device, computer hardware and software used to access our website. This may include the following: § IP address of device(s) used; § Browser type; § Operating system and device type; § Referring website addresses; § Access times and dates; and § Approximate location e.g. London.

o This personal information helps us to deliver more helpful information. Please see cookies for further information - <https://www.monsoon.co.uk/policies/policies-cookie.html>

- Information we collect from you in store.

o We collect your email address from you if you agree to receive an e-receipt.

o We collect your email address if you ask to sign up to our newsletters and marketing.

o We use CCTV in our stores so we may collect your personal information, in the form of your image, on our CCTV footage.

#### HOW WE USE YOUR INFORMATION

When you provide us with your personal information, we store it securely and use it for:

- Helping to process your orders where these are made online,

- Providing admin support for your account

- Helping with your customer services enquiries

o It is necessary for us to use your personal information to process your orders so you can purchase what you want.

o It is in our legitimate interests to use your personal information when we provide admin and customer services support so that we can provide the very best service to you. - 3 - 92971/163/4541740-v0.2

- Crime and fraud prevention (when we might also share it with the police or other authorities if required by law)

o It is in our legitimate interests to protect our business from fraud and we only keep our CCTV footage in accordance with our data retention policy/for 31 days unless required otherwise by law

- Marketing

o Where you have 'opted in' to receive our newsletters and marketing we use your personal information in this way with your consent.

We may also send out Direct Mail from time to time. You may opt out of receiving direct mail from Monsoon at any time by emailing [directmail@monsoon.co.uk](mailto:directmail@monsoon.co.uk).

- Administering promotions or competitions on our Website

o Where you enter a competition, it is necessary for us to process the data in this way in order to administer the competition and to ensure you can receive your prize if you win. Please be assured that any third parties will only use your data to fulfil your prize unless you have separately consented to them receiving your email or other contact details for marketing purposes.

- Credit decisions (when we might also share the information with credit reference agencies, subject to your consent)
- Analysis of our customer base and profiling

o We use your personal information to profile to decide which products or services you might prefer and so these are tailored to you.

o It is in our legitimate interest to use your personal data in this way so that we provide the best service and opportunities for you as possible.

o You can ask us to stop processing your personal data for profiling at any time by contacting Customer Services - <https://help.monsoon.co.uk/hc/en-gb/requests/new>

#### WHO DO WE DISCLOSE OR SHARE YOUR INFORMATION WITH?

We disclose your personal information to our suppliers and processors including our group company Adena Brands Limited, so that they can help us to process orders, provide administrative support, analyse our customer base to help improve our products and services. Where you have consented to receive newsletters and marketing our marketing agencies will also have access to and process your personal information on our behalf. In addition we may disclose CCTV footage to law enforcement if we are required to. Except for that, we don't share your information with any third parties except our suppliers who we've checked out first and who we appoint to work with us to provide services to you.

#### HOW LONG DO WE KEEP YOUR INFORMATION?

We only keep your information as long as we need to, for the purposes listed above. When we no longer need it, we delete it securely. Please note if you ask us to stop processing your information for marketing purposes, we may need to actually retain some of it to ensure your details are kept on our marketing suppression lists. - 4 - 92971/163/4541740-v0.2

#### HOW TO OBJECT, ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal information we hold about you:

- Your right of access. If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- Your right to rectification. If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- Your right to erasure. You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable).

If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to restrict processing. You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to data portability. With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere.

- Your right to object. You can ask us to stop processing your personal information, and we will do so, if we're:

- o relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing; or

- o processing your personal information for direct marketing.

- Your rights in relation to automated decision-making and profiling. - 5 - 92971/163/4541740-v0.2 You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and Monsoon Brands Ltd.

- Your right to withdraw consent. If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- Your right to lodge a complaint with the supervisory authority. If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113. To exercise your legal rights please notify us by contacting Customer Services - <https://help.monsoon.co.uk/hc/en-gb/requests/new> .

## CHILDREN

You are required to be at least 16 years old to register an account or have a reward card so we do not intentionally collect personal information from anyone under 16 and no one under 16 should attempt to submit any personal information to us. Should we discover that any such personal information has been delivered to any of the sites, we will remove that personal information as soon as possible.

## COOKIES

Most websites use cookies, and we do too, to keep offering you the best service. A cookie is way of transferring little bits of information from our website back to us, which means, for example, that

we can see which pages or products are our most popular and then deliver more of the good stuff to you in future. There are a few different kinds of cookies and they each do slightly different things.

#### WEBSITE FUNCTIONALITY COOKIES

These simply enable you to browse our website and use all our functions, like your Bag or Account pages.

#### WEBSITE ANALYSIS COOKIES

These help us to measure how the people on our site are using it, and we use this information to constantly improve the way we do things.

#### CUSTOMER PREFERENCE COOKIES

- 6 - 92971/163/4541740-v0.2 You know how when you land on our website from your laptop, the site knows that you're in your home country? That's the customer preference cookies hard at work. They help us to make sure your online experience is simple, easy and relevant to you.

#### TARGETING COOKIES

We sometimes run online advertising campaigns, and, if we think you'll be interested in what we have to say, targeting cookies will help us to deliver that message to you. More importantly, they limit the amount of times you see any of our ads, so you don't get fed up!

#### HAVING ISSUES ONLINE? ACCESSING SECURE PAGES

It may be that there's a firewall blocking your access to secure pages. Some businesses or networks use firewalls to moderate the content employees or users can see. Try contacting your IT team to request access.

#### FINDING YOUR CARD'S SECURITY CODE

On most credit and debit cards, this code is found on the reverse of your card. Take the last three digits of the number on your signature strip – that should be it. On American Express cards, look for a four-digit number on the front.

#### VERIFIED BY VISA & MASTERCARD SECURECODE

If you're having issues with your password for this, you'll need to contact your card-issuing bank. We don't have access to any of your account information for Visa and Mastercard Securecode.

#### COOKIES

If you want to know more about cookies and what they're used for, check out the About Cookies website - <https://www.monsoon.co.uk/policies/policies-cookie.html> . It will talk you through everything from the basics to how you can opt out of certain ones.