

Loyal to Fylde:
Privacy Policy
Version 1.0 Updated: 08/09/18

Definitions

In this policy, the following definitions are used:

Application: means a software application by which the Member registers for the Loyalty & Rewards Programme.

Loyalty & Rewards Programme: means the Loyal to Fylde Loyalty & Rewards Programme to which you have subscribed (a) in respect of a specific Retailer; and/or (b) with LTF more generally.

Member/You: means you, a customer who has (a) subscribed for the Loyalty & Rewards Programme on the LTF website directly; or (b) via a Retailer's browser access.

Personal Data: means any information relating to an identified or identifiable natural person.

Retailer: means the third party participating Retailer on whose behalf LTF administer the Loyalty & Rewards Programme.

Transaction: means a point of sale purchase made by a Member with a valid Loyal to Fylde Loyalty Card with a participating Retailer.

1. General

Averso Ltd. (Trading as Loyal to Fylde) ("**LTF**") is committed to protecting and respecting the privacy of all members of the Loyalty to Fylde Loyalty & Rewards Programme.

This policy (together with the terms and conditions of the Loyalty & Rewards Membership Agreement and any other documents referred to in it) sets out the basis on which any Personal Data LTF collects, or that you provide to LTF, will be processed. Please read the following carefully to understand LTF's practices regarding your Personal Data and how we will treat it.

2. Data Controllers

LTF

For the purpose of data protection legislation, LTF is the data controller.

As data controller, LTF determines the purposes for which (and the manner in, which) your personal data will be processed.

Retailer

The Retailer will also be data controller in common with LTF. In subscribing for the Loyalty & Rewards Programme you have freely given your specific, informed and unambiguous consent to receive marketing communications from the Retailer regarding the Retailer's products, services, offers, loyalty rewards and other information which the Retailer believes may be of interest to you. These notifications will appear in your account inbox, not via e-mail. You are able to opt-out of receiving any further notifications on a retailer-by-retailer basis.

In addition, you may have supplied the Retailer directly with Personal Data and consented to the Retailer using that data for purposes which are not connected with the performance of the Membership Agreement or the administration of the Loyalty & Rewards Programme. This data is to be distinguished from the data LTF has collected from you as we will not be processing this data. For example, you may have agreed to the Retailer's collection, use, transfer and storage of your data for the Retailer's own business purposes including credit

checks, administration of contractual arrangements, sales and marketing. You should request and check the terms of the Retailer's own privacy policy in these circumstances. LTF is not liable in respect of any data which is controlled by the Retailer or any data which is processed by the Retailer outside the scope of the permissions granted by you under the terms of this policy or the Membership Agreement.

3. Information LTF collects from you

LTF will collect and process the following data about you:

Information you give LTF:

- This may include your name, address, e-mail address and phone number, and other information which is necessary for the administration of the Loyalty & Rewards Programme.
- We obtain this information when you subscribe to the Loyalty & Rewards Programme either via our website, or one of our Retailer's web browser.
- Information you have provided to the Retailer and authorised them to share with us so that we can administer the Loyalty & Rewards Programme.

Information LTF collect about you:

Whenever you access the Application or make use of the Loyalty Card issued in relation to the Loyalty & Rewards Programme, LTF will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect to our website, and your login information;
- information about your visit, via our cookie policy
- information about your purchase amount, the location and time of the transaction and potentially the type of product(s) you purchased. No payment information is collected.
- Cookies - our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

4. How we use your information

LTF will use information held about you in the following ways:

Information you give to LTF: LTF will use this information:

- In the performance and administration of the Loyalty & Rewards Programme you have subscribed to and to provide you with the information, products and services that you request from LTF;
- To provide you with information about other goods and services which are offered by the Retailer on whose behalf LTF are administering the Loyalty & Rewards Programme;
- To provide the Retailer with all information they need in respect of the Loyalty & Rewards Programme you have subscribed to, including (but not limited to) for the purpose of administering your account and tracking loyalty points and rewards earned, issued, redeemed, cancelled and other information relevant to your account;
- to notify you about changes to LTF's service, this privacy policy, or the terms of the Loyalty & Rewards Programme;

- to ensure that any of LTF's content (whether on an Application or on any LTF or Retailer website) is presented in the most effective manner.

Information LTF collects about you: We will use this information:

- To administer the Application, LTF's website or the Retailer's website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To ensure that the content we provide to you online is up to date, effective and secure.
- to allow you to participate in interactive features of the Loyalty & Rewards Programme, when you choose to do so.
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information LTF receive from the Retailer and other sources: LTF will combine this information with information you give to LTF and information LTF collects about you. LTF will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. Disclosure of your information

We may be required to disclose your personal information under the below circumstances:

- If LTF or substantially all of its assets are acquired by a third party, in which case personal data held by LTF about Members and the loyalty schemes administered by it will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data due to a legal obligation,
- Or in order to enforce or apply the terms of the Membership Agreement and other agreements;
- Or to protect the rights, property, or safety of LTF, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6. Where LTF will store your personal data:

All information you provide to LTF is stored on the secure servers of one of our Third-Party Suppliers. Where LTF has given you (or where you have chosen) a password which enables you to access your account, you are responsible for keeping this password confidential. LTF asks you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although LTF will do its best to protect your personal data, LTF cannot guarantee the security of your data transmitted via an Application, LTF's website or a Retailer's browser; any transmission is at your own risk. Once LTF has received your information, LTF will ensure that strict procedures and security features are in place to try to prevent unauthorised access.

LTF's website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that LTF does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7. Third Party Processors

How long LTF will store personal data:

LTF will store your Personal Data for as long as is necessary to carry out your subscription to the Loyalty & Rewards Programme.

If you cancel or end your subscription to the Loyalty & Rewards Programme LTF will retain your Personal Data for a period of six (6) years from the date of termination in order to enforce or apply the terms of the Membership Agreement and other agreements; or to protect the rights, property, or safety of LTF, the Retailer, LTF's customers, or others.

8. Your rights

If you are an individual in respect of whom LTF processes Personal Data, you have the following rights:

Right of access to your Personal Data

- you can request a copy of the Personal Data LTF holds about you. If your request is sent to LTF electronically LTF will supply this in a commonly used electronic form, unless you specifically request this in a different format.
- LTF will supply the data within 1 month of the date of your request free of charge. If your request is complex or numerous LTF may extend this period by a further period of two months (though LTF will inform you within one month of the receipt of your request if this is the case and explain why the extension is necessary).
- LTF reserves the right to charge a reasonable fee if you request additional copies of the information, to cover LTF's administration costs. If access requests are unfounded or excessive LTF may charge a reasonable fee to provide the data, take the action requested, or refuse to act on the request.

Right to notification of any breach

In the unlikely event of a Personal Data breach which is likely to result in a high risk to your rights, LTF will notify you of the breach without undue delay.

9. Changes to our privacy policy

Any changes LTF makes to this privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

10. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to privacy@loyaltofylde.co.uk.