

Online Retail Shop Privacy Policy



This policy is to be read in conjunction with, and makes reference to the main Privacy Policy of Post Office Limited. This Online Retail Shop Privacy Policy deals with the data processing activities that are specific to Post Office Limited's online Shop and related services only.

What information we collect about you, and why

The information we collect about you, will vary depending on the purposes of the processing, and what you have agreed to.

If you agree to further processing of your data for different purposes, in addition to purchasing merchandise from our shop, we may need to seek your further permission to process some, or all of this data for these different purposes. The way that we ask for permission from you for these additional Services is either via **'Consent'** or **'Performance of a Contract'**. Gathering permission from you using **'Consent'**, gives you more rights, and these rights are detailed in the main Privacy Policy of Post Office Limited. Post Office Limited will additionally have to process some or all of your data without your permission, and this is where we have a legal obligation to do so, or we have a **'Legitimate Interest'** in doing so.

Where you give us permission by way of **'Consent'** to process your data for specific reasons, you have a real choice about how long these permissions last. At any time, you can ask us to stop processing your data for that purpose by withdrawing your **'Consent'**.

Where we collect your data from

Most of the information you provide directly to us yourself. We also collect other pieces of information which can be regarded as observed, that is data we capture as part of providing you the service, for example, location data provided when you use the internet to purchase goods. Additionally, we collect, derive or infer some of your data from 3rd parties, for example, during a credit check, if this is necessary when using our services.

The Purposes:

Supply and dispatch of merchandise

To provide services of supply and dispatch of merchandise purchased through our online shop, including maintaining your account with us. For this purpose we collect the list of data detailed under **'Categories of Personal Data'**. You give us permission to collect and process all or some of this data by agreeing to a contract between us. The **'Performance of a Contract'** is the basis we use to process your data. Additionally, see **'Legal Obligations'** placed upon us when providing this service to you.

Legal obligations which Post Office Limited must adhere to on request

For the purposes of meeting different legal obligations under UK law, Post Office Limited, if instructed to do so, must process all, or some of the data under **'Categories of Personal Data'** for the period defined in the different laws. For example:

In the interests of national security, preventing and detecting crime and other reasons as may be required. For this purpose, we don't ask for your permission, as we rely on the lawful basis of **'Legal Obligation'** placed upon Post Office Limited (as the Controller of your data).

Legal obligation which Post Office Limited must adhere for invoicing, accounting and audit

Post Office Limited must retain your personal data for VAT, taxation, finance, accounting, and audit purposes. The detail we need to process is detailed under **'Categories of Personal Data'**, excluding **'Connecting to our website'** for this purpose, we don't ask for your permission, as we rely on the obligation placed upon the Post Office Limited (as the Controller of your data). Some of this invoicing data is needed for wholesale billing, which is to pay our suppliers, in addition to billing you.

Credit management and referencing

It may be necessary to share your personal data with Credit Reference Agencies, Fraud Protection Agencies, and Debt Collection Agencies, and they will provide us with information about you, including your financial history. We need to do this

to check your identity to confirm you are who you say you are, and assess whether you can afford to pay for the merchandise you have requested. The detail we need to process for this purpose, is all the details under '**Categories of Personal Data**', excluding 'Data when connecting to our website'.

When we share your data with these agencies in order to request information relating to you and analysis of your financial history, they will place a search footprint on your credit file that may be seen by other organisations. These agencies will also be linked with information about your spouse or partner, or any financial associate. Before applying for our Services, you must ensure that you also have your spouse/partner/financial associate's permission to share their data.

The permission we use for processing for this purpose is '**entering into, or performance of a contract**'.

Categories of Personal Data

When we provide the Services above, we collect different categories of personal data, these are:

Data for contacting you:

Name, title, address, telephone number, alternative telephone number, such as mobile, previous address (where you have changed address), and email address.

Data about you:

Your credit check details, customer reference number, password, your preferences and choices regarding the merchandise you have chosen, and your preferences regarding if you would like us to contact you about other services and offers.

Data about your account, including maintaining your account with us

Details of and on your bills; data of the bill, bill/invoice number, the amount of the bill, the due date for payment, method of payment, the date you made payment, unpaid bills, whether a debt collection agency has been engaged for arrears of payments, payment plans, disputed bills, postage costs, address to which your card details are registered, and payment card details, and delivery address, customer/account identifier

A recorded message if you call us, or we call you, for any reason at all, including the date and time of when you called us, or any other correspondence and communication with us, including emails and letters, as well as enquiries in our branches. Your user name and information used to identify you before disclosing any personal data with you.

Invoicing data

Name, customer reference number, address, telephone number, email address, details of the Services we are providing to you as detailed on your bill, date of invoice, invoice number, date of collection of payment, method of payment including your bank details, amount and rate of VAT, details of merchandise you have bought with us, whether the bill is paid or not. Some of this invoicing data is needed for wholesale billing that is to pay our suppliers, in addition to billing you.

Data when connecting to our website.

Your browsing information, that is when you visit our website, the date and time you visited our website, the length of time you were browsing our website, the browsers you use and other information about your device (your terminal equipment) you are using to access our services, for example the operating system, software and hardware on your device. We also collect the MAC address of your device and your IP address, which can tell us your **location** when you connect, or attempt to connect to access our online shop, as well as successful and unsuccessful log in attempts, your password, and changes in passwords to access your account online.

We also use and store cookies on your devices (please see the main Cookie Policy on the Post Office website).

Retention Periods

Supply and dispatch of merchandise

For this purpose, we retain some or all of the data under 'Categories of Personal Data' for the duration you have an account with us, and **until 18 months** after you last used your account.

However, when connecting to our website in order to view and / or purchase merchandise, we only retain data concerning your connection to the website, as well as information from your devices, excluding data collected by way of Cookies.

Cookies retention period will depend on the type of cookie, and your chosen preferences.

Legal Obligations which Post Office Limited must adhere to on request

For the purposes of meeting legal obligations under UK law, Post Office Limited, if instructed to do so, must retain your data for the periods defined in the different laws, as and when a request is made. This might be to help fight crime, and in the interests of national security. The retention period can vary according to specific instructions under the law, at the time the instruction is given.

Legal obligation which Post Office Limited must adhere for invoicing and accounting

For purposes of invoicing, VAT, taxation, and accounting and auditing obligations, we retain data under 'Invoicing data' data for **a period of 7 years** as required under UK law.

Credit management and referencing

For the purposes of using and sharing data with 3rd party credit referencing, fraud protection agencies and debt collection agencies, we retain this data from the period **you apply for our services, during the period you are supplied with our services, and until all monies owed to us have been paid, or until the debt has been sold** to a debt collection agency.

If your application to supply merchandise is rejected based on information we receive from these Credit Reference Agencies, we retain your data for **up to 3 months**.

Using and analysing your information

The analysis we do, can, for example, help inform us about which parts of the Services you use most frequently, how you use these Services, and generally make conclusions about your preferences and behaviour. If we do not have your Consent to do this, we may not be able to provide you with goods that may be tailored to you specifically. We also use analysis from your financial history including your information held with Credit Reference Agencies, this allows us to ensure that we are supplying the goods to the correct person, and that you can afford to pay for these goods, and make a decision on whether to enter into a contract with you to supply our goods and/or services. Sometimes our analysis of your financial history will result in us not being able to provide the goods or services to you.

In some circumstances we analyse your data for marketing, and we may require your permission, by way of **'Consent'**, of course, to inform you of your rights again, you can just withdraw that 'Consent' at any time, and we will stop doing this.

Who we share your data with

We use a number of service providers or categories of service providers to help us deliver our Services to you, this includes for example, hosting companies, payment services organisations who allow us to process payments, and credit and fraud detection agencies. We are also obliged to share your data with regulatory authorities, such as HMRC, and law enforcement authorities when requested.

Some of these providers have obligations of their own in terms of processing your data that we provide to them directly, or they can also derive some data from other sources, such as credit scoring agencies. In

combination with reading our Privacy Policy, you should also read their Privacy Policy, to ensure you are fully aware of how and why your data is being processed with them.

These providers, or categories of service providers, whose privacy policies, where applicable, should be read in conjunction with our policy are.

- UK Government www.gov.uk for dealing with taxation investigations, including HMRC.
- Law enforcement or regulatory authorities, courts, or public authorities, if we are required to share by law
- Information Commissioners Office – www.ICO.gov.uk if there is an investigation of any nature.
- Banking organisations for processing your payments
- Experian (www.experian.co.uk) and Equifax (www.equifax.co.uk) who we use to do credit reference and fraud protection checks. In addition we are obliged to include the following link which describes how the Credit Reference Agency (CRAIN) process your data - <http://www.experian.co.uk/crain/index.html#question1>

Other service providers or categories of service providers that we use to process your data on our behalf, will be under our instruction only, for example:

- Hosting companies
- ISP's and network providers
- Cheetah Mail (marketing)
- Royal Mail/UPS and other dispatch organisations
- VOW Limited who manage our online shop on our behalf

Where your data is processed

Post Office Limited processes your data within the EEA only.