

## **PRIVACY NOTICE**

This Privacy Notice aims to give you information about how we collect and process your personal data when you use the website or app this Privacy Notice is linked to. This Privacy Notice covers any personal data you provide when you create an account as a Wholesale customer or business contact, purchase a product or otherwise interact with us.

We want to make sure you know who we are, how you can contact us, the personal data we process, how we use it, who we share it with, how long we keep it for and the choices you have to exercise your legal rights.

It is important that you read this Privacy Notice together with any other privacy notice we may provide when we collect or process your personal data so that you are fully aware of how and why we are using your data. In particular, please read this Privacy Notice in conjunction with our [Cookie Policy](#).

This Privacy Notice covers the following topics:

1. Who we are
2. How to contact us
3. What we use your personal data for
4. The personal information we collect and use
5. Who we share your personal information with
6. International transfers
7. How long your personal data will be kept
8. Keeping your personal data secure
9. Control over your information
10. Your legal rights

### **1. WHO WE ARE**

C. & J. Clark International Limited is a company registered in England and Wales (company number 00141015) with a registered office at 40 High Street, Street, Somerset, BA16 0EQ.

When we mention “Clarks”, “we”, “us” or “our” in this Privacy Notice, we are referring to C. & J. Clark International Limited.

For the purposes of data protection legislation, we are the data controller of your personal data. We are registered with the Information Commissioners Office in the UK with reference number Z5755995.

### **HOW TO CONTACT US**

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Privacy Notice. If you have any comments, questions or

requests in relation to this notice or how we handle your personal data, please address them to Privacy, Box No. 87, C. & J. Clark International Limited, 40 High Street, Street, Somerset, BA16 0EQ or email us at: [privacy@clarks.com](mailto:privacy@clarks.com).

## **2. WHAT WE USE YOUR PERSONAL DATA FOR**

This section explains the purposes for which we use personal data about you. More detail about the types of personal data that we might use for these purposes can be found in section 4.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

### **RELATIONSHIP MANAGEMENT**

We use personal data for relationship management purposes; Relationship management is the ongoing maintenance of our relationship with our Wholesale Customers and business contacts. This could include activities such as letting you know about product changes, planned maintenance activity or contacting you with billing enquiries. We also use your personal data to set you up and identify you as a Wholesale Customer and business customer.

### **MARKETING**

We use personal data for marketing purposes. This includes providing you with original insight, commentary and updates on our products,

We will not make contact with you for marketing purposes through any particular channel (such as email, telephone or post) and we will only contact and send you marketing material if you have signed up and consented for us to do so.

### **PROVIDING SERVICES**

Sometimes we might need your personal data to provide you with information, services, alerts and facilities that you have asked for. For example, if you sign up to be a Wholesale Customer we might use your contact details to alert you of upcoming downtime for the website, make orders on your behalf, follow up on an open support ticket, confirmation emails for orders, shipping emails, marketing emails that you have elected to receive and Clarks company updates or messages.

### **LEGAL AND REGULATORY PURPOSES**

We may use your personal data for legal and regulatory purposes. For example, this might include responding to complaints or enquiries from you or a regulator about how we have used your personal data.

### 3. THE PERSONAL INFORMATION WE COLLECT AND USE

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data which includes your first and last name and will identify and verify you as a Wholesale Customer and business contact.
- Contact Data which includes your billing address, delivery address, email address and Personal and/ or Business telephone number.
- Technical Data which 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 the website

We obtain and use information from various sources. These are summarised in the following table:

Type of information	Description	Source
Name and contact details	This is basic personal data about you at your place of work and how to get in touch with you. This data will also be used to set-up and identify you as a Wholesale Customer and business contact.	This information is usually provided directly by the relevant individuals; it could for example be given over the telephone, in an email, through our website, or in person.
Organisation – related details	This is information about your organisation and your role within it, such as your job title and who your colleagues are.	
Login credentials	This is information such as your username (email address) and password, which are recorded if you sign up to be a Wholesale Customer	This information is provided by you or may sometimes be generated by us (for example if we reset a password for you).
Contact history	This is information about our dealings with you, who in our company knows you, and what meetings or events you have attended. It also includes your behaviour in response to our interactions with you, such as whether you have opened our emails.	We produce these records ourselves.

Device information	This is information about the device you are using to access our website to create an account, such as type of device, its operating system, browser, its IP address and what cookies are on it.	We produce these records ourselves by monitoring you use of our website.
Financial information	We store tokens from our third-party payment providers in our database when you make payments on the website.	This information is provided by you when you create a Wholesale Customer account or make payments on our website.

We ensure that the collection and use of your personal data is lawful. Therefore, for the purposes listed above, we only use your personal data if one of the following conditions apply:

1. You have given us your consent
2. We need your personal data for the performance of a contract you enter into with us, such as when you purchase a product through the website or app
3. We need to comply with legal obligations
4. We need to protect your vital interests
5. Your data is necessary for the public interest, or
6. We have a legitimate interest in processing the personal data

## 5. WHO WE SHARE YOUR PERSONAL DATA WITH

We share your personal data with the following categories of companies as part of being able to provide our services to you:

- Members of the Clarks group of companies, where they assist us in providing our services to you
- Companies that help us get your order to you, such as payment service providers, warehouses operators and delivery companies
- Marketing service providers, such as marketing agencies and advertising partners who help us market our business

- Technology service providers, such as companies that support our IT, help us analyse the data we hold, send communications to our customers and help us develop and host our websites and apps
- Professional advisors, such as companies that provide us with legal or financial advice
- Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud and other unlawful activities
- Companies approved by you, such as social media sites

Third Party	Service Description	More Information
Bazaar Voice	Product reviews	<a href="https://www.ibm.com/digital-marketing/coremetrics-software">https://www.ibm.com/digital-marketing/coremetrics-software</a>
Core Metrics	Site analytics	<a href="https://www.ibm.com/digital-marketing/coremetrics-software">https://www.ibm.com/digital-marketing/coremetrics-software</a>
Cybersource(US)	Payment provider	<a href="https://www.google.com/search?client=firefox-b-d&amp;q=cybersource">https://www.google.com/search?client=firefox-b-d&amp;q=cybersource</a>
Google Tag Manager	Site analytics	<a href="https://marketingplatform.google.com/about/tag-manager/">https://marketingplatform.google.com/about/tag-manager/</a>
Ingenico (for UK)	Payment provided	<a href="https://www.ingenico.com/">https://www.ingenico.com/</a>
Salesforce	Marketing email service	<a href="https://www.salesforce.com/">https://www.salesforce.com/</a>

Some of these third-party recipients may be based outside the European Economic Area — for further information including how we safeguard your personal data when this occurs, see ‘Transfer of your information out of the EEA’.

#### 4. INTERNATIONAL TRANSFERS

In order to process your personal data for the purposes set out in this Privacy Notice, we may transfer your personal data to third parties and other companies in our group that are based outside of the EEA.

Whenever we transfer your personal data out of the EEA, we attach a similar degree of protection to it (as it would receive in the EEA) by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries, territories or sectors within a country that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- The transfer is subject to a legally binding and enforceable commitment on the recipient to protect the personal data (e.g. through the use of European Commission approved standard contractual clauses).
- Where we use service 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 Europe and the US.
- The transfer is made subject to binding corporate rules.
- The transfer is based on a derogation from restrictions on transferring personal data outside of the EEA (such as where you give your consent, the transfer is necessary for the performance of contract with you, or the transfer is necessary for the establishment, exercise or defence of legal claims).

## **5. HOW LONG YOUR PERSONAL DATA WILL BE KEPT**

We will not keep your data for any longer than we need it.

If you are a representative of one of our Wholesale Customers, this means that we will normally keep your personal data while you or your employer has an ongoing relationship with us, or if you have demonstrated an interest in our products.

You can request us to delete it earlier as explained in section 9.

## **6. KEEPING YOUR PERSONAL DATA SECURE**

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

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## 7. CONTROL OVER YOUR INFORMATION

Under the General Data Protection Regulation, you have several important rights available to you. In summary, those include rights to:

- Be informed about how your personal information is being used (hopefully this privacy notice explains it all)
- Access the personal information we hold about you
- Request that we transfer elements of your data to another service provider
- Request us to correct any mistakes in your information which we hold
- Request the erasure of personal information concerning you in certain situations
- Receive the personal information concerning you which you have provided to us, in a structured format or to ask us to transfer that information to another service provider
- Stop any direct marketing
- Object to processing of your personal data
- You can ask us to restrict or suspend processing of your personal data under certain circumstances, for example if you want us to restrict processing while the accuracy of personal data is being established
- Right not to be subjected to automated decision-making that significantly affects you, however, we will only use automated decision making in limited circumstances
- Right to withdraw your consent, where processing of your personal data is based on consent, you can remove it at any time

For further information on each of these rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation.](#)

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

- Email, call or write to us at Privacy, Box No. 87, C. & J. Clark International Limited, 40 High Street, Street, Somerset, BA16 0EQ or email [Privacy@Clarks.com](mailto:Privacy@Clarks.com), phone 01458 899 904

Let us have enough information to identify you;

Let us know the information to which your request relates

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you and keep you updated.

## **8. HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information. If you are not happy with how Clarks manages your personal data, you have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

## **HOW TO CONTACT US**

If you wish to contact us please send an email to [privacy@clarks.com](mailto:privacy@clarks.com) write to Privacy, PO Box 87, 40 High Street, Street, Somerset, BA16 0EQ. or call 01458 899 904.