

## PRIVACY POLICY

Any reference to **we** or **us** in this Privacy Policy shall mean Dormie Network, LLC a limited liability company registered in the State of Nebraska (USA) with registered address at 4433 South 70<sup>th</sup> Street, Lincoln, NE 68516 USA.

This Privacy Notice tells you about your privacy rights and sets out how we, as a controller, collect, use, process and disclose your personal data relating to your interactions with our brands and services, and any corresponding websites (the **Websites**) owned and operated by us. This Privacy Notice should be read in conjunction with our [Cookie Policy](#)<sup>1</sup>.

Our Privacy Policy is regularly reviewed to ensure that we continue to respect your privacy. We reserve the right to update this Privacy Policy from time to time by publishing the updated version on the Websites. We therefore encourage you to review our Privacy Policy periodically for the most up to date information.

We take great care of any information that you give us, and in the following paragraphs we set out how any personal information you give us is treated. This Website is not intended for children and we do not knowingly collect data relating to children.

If you have any questions regarding our Privacy Policy, please [Contact Us](#)<sup>2</sup>.

### WHY DO WE HAVE THIS POLICY?

Your privacy is important to us, and we are committed to protecting your personal information from unauthorized use or disclosure. We will therefore use your personal information, and transfer it to others, in accordance with this Privacy Policy.

Our Privacy Policy applies whenever you visit the Websites, during the period you receive services from us, during the process of you ordering products from us and afterwards.

### 1. WHAT INFORMATION DO WE COLLECT AND WHEN?

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). We only collect information that we will use for the purposes set out in this policy.

Specifically, we collect:

- **Information you submit to us**
  - Through forms, for example signing up to an offer, news or a competition;
  - By sending us emails and text messages (SMS or MMS);
  - By adding posts, reviews and other comments to the Websites, any mobile phone applications, or other community forums;
  - By interacting with us on social media platforms (such as Facebook or Twitter);
  - By speaking to us over the telephone; or

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<sup>1</sup> Should link to the Cookies Policy

- By registering accounts on the Websites or any mobile phone applications, including setting up passwords and preferred user names, contact details, account details, your preferences and interests.

If you do not provide us with your personal data we may not be able to provide you with our services, products or respond to any questions or requests you submit to us via our Website. (Please note: If you submit details to us of any other person (e.g. a friend), please make sure you have their permission before doing so.)

- **Information we collect about you**

- **Full details of the purchases you make** on the Websites or on the telephone, including the time and date of purchase, the products you purchase from us, any relevant delivery address and details of any relevant payment card.
- **Information on what you search for, view, click on and access** in and through the Websites, our marketing emails and text messages (SMS or MMS). We may collect the time and geographic location of your device when you do so. This information may also include where you came to the Websites from, and where you went when you left it. We also track how often you visit and use the Websites. We do this through the use of email and website cookies (see our [Cookies Policy](#)).
- **Technical information about the devices you use** to access the Websites. We collect each device’s unique identifying code (MAC address), relevant IP address, operating system and version, web browser and version, and geographic location
- **Profile information and insight from companies who already have information on you, such as credit reference agencies (customer insight companies).** They give us their views on what your household may look like, your status, likely preferences and behaviours.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 2. HOW DO WE USE YOUR INFORMATION?

We will only use your personal data for the purposes and legal bases set out in the table below.

Why we use your personal data	What our legal basis is for doing so
<p><b>To provide you with the Website</b>, which requires a certain amount of technical information to be collected in order to work properly.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how Website users use our products/services) provided such interests are not overridden by your interests and rights.</p>

<p><b>To power security measures and related services relating to your access to the Website</b> for example to enable us to recognise your username and password and reset these if you forget them.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how Website users use our products/services) provided such interests are not overridden by your interests and rights.</p>
<p><b>To enable you to order products from us on the Website</b>, which again requires a certain amount of personal data to be collected, for example your payment card details so we can take payment and the products you buy so we can provide you with an invoice and receipt.</p>	<p>The processing is necessary to perform a contract or enter into a contract with you</p>
<p><b>To enable us to run competitions and offers for which you have signed up</b>, about which we need to be able to communicate with you.</p>	<p>Where you have given consent to the processing of your personal data for direct marketing – which you may withdraw at any time</p>
<p><b>To gather feedback from you</b> about the Website, our products, other services and activities from time to time. We may invite you to provide this feedback on occasion, for example by emailing you to ask if you would like to review a product you have bought. We may use independent research and feedback providers to do so on our behalf.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) provided such interests are not overridden by your interests and rights.</p>
<p><b>To contact you from time to time about things you have told us you want to hear about</b>, for example our products, news, offers, new competitions and sponsored events.</p>	<p>Where you have given consent to the processing of your personal data for direct marketing – which you may withdraw at any time</p>
<p><b>To respond to any questions, suggestions, issues or complaints you have raised with us.</b></p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to review issues with our products/services) provided such interests are not overridden by your interests and rights.</p> <p>The processing is necessary to perform a contract or enter into a contract with you.</p>

<p><b>To communicate with you about operational changes to the Website</b> for example if we were to withdraw or change this privacy policy.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to review issues with our products/services) provided such interests are not overridden by your interests and rights.</p> <p>The processing is necessary for us to comply with legal and regulatory obligations.</p>
<p><b>To gather statistics about how you and other people use the Website and other digital content.</b> We then analyse these statistics to understand if these things meet most people's needs, or if they should be improved, and if so, what design or other changes (for example, around the nature and timing of communications) would be most beneficial for our customers and our business.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) provided such interests are not overridden by your interests and rights.</p>
<p><b>To monitor use of the Website to see if it is being abused or threatened</b> for example by potential hackers looking to undermine their security.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to review issues with our products/services) provided such interests are not overridden by your interests and rights.</p> <p>The processing is necessary for us to comply with legal and regulatory obligations.</p>
<p><b>To protect you and our business against any other criminal behaviour,</b> including identity theft and fraud.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to review issues with our products/services) provided such interests are not overridden by your interests and rights.</p> <p>The processing is necessary for us to comply with legal and regulatory obligations.</p>

<p><b>To understand you better</b> and, in particular, your habits, your location from time to time and your personal circumstances.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) provided such interests are not overridden by your interests and rights.</p>
<p><b>To enable us to understand what our customer and user base looks like</b> across our business. We do this by combining your information with information about our other customers and users of the Website, so we can spot trends and common factors.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how Website users use our products/services) provided such interests are not overridden by your interests and rights.</p>
<p><b>To enable us to conduct focused market research</b> based on trends that we identify, which we can then use to further improve our products and services for all our customers.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to study how customers use our products/services, to develop them and grow our business) provided such interests are not overridden by your interests and rights.</p>
<p><b>In the process of anonymising your information</b> so that you are no longer identifiable to us.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to ensure data minimisation) provided such interests are not overridden by your interests and rights.</p>
<p><b>To test new systems and processes</b> as we roll them out to make sure they work and will meet the high expectations we set for ourselves.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) provided such interests are not overridden by your interests and rights.</p>
<p><b>To assist us in the development of new products and services over time</b>, for example to gauge whether a new product is likely to appeal to a large proportion of our customer base.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to develop our products/services and grow our business) provided such interests are not overridden by your interests and rights.</p>

<p><b>To analyse whether the money we spend on advertising</b> on trade publications and trade websites, online and in search engines represents good value.</p>	<p>Where you have given consent to the processing of your personal data for direct marketing – which you may withdraw at any time.</p>
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**Where we rely on our legitimate business interests to allow us to process your personal data or we process your personal data for direct marketing, you have the right, at any time, to object.**

### 3. WHO DO WE SHARE YOUR INFORMATION WITH?

We cannot run our business or provide many of our services and benefits without involving other people and businesses and sometimes we pass your information to these other people and businesses as set out below. We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with:

- **Our affiliates** because we hope to have a relationship with you across all these different brands and businesses, if not now, then in the future, and we want to be able to provide you with the same value and high quality of experience wherever you choose to interact with us.
- **Other people and businesses who help us provide the Websites, and related services to you**, for example, information technology companies who design and host the Websites and payment services companies who enable you to use payment cards with us.
- **Advertiser and advertising networks** which require the data to select and serve relevant adverts to you and others. We may use the information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advert to that target audience.
- **Third parties** who in our reasonable opinion make a claim that any content posted or uploaded by you to the Website constitutes a violation of their intellectual property rights, or of their right to privacy.
- **Analytics and search engine providers** who assist us in the improvement and optimisation of the Websites.
- **Our insurers and insurance brokers** where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- **Business partners, suppliers and sub-contractors** for the performance of any contract we enter into with them or you.
- **Our professional advisers** for example our lawyers, accountants and technology consultants when they need it to provide advice to us.
- **The police, local authorities, the courts** and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime.
- **Other people who make a subject access request to us**, where we are allowed to do so by law (see **Managing Your Information** below for what we mean by a **subject access request**).

We may also share the information we collect where we are legally obliged to do so, for example, to comply with a court order.

#### **4. SECURITY OF YOUR INFORMATION**

Information provided through the Websites is stored on our secure servers or those of any third party we engage to provide our IT platform, and is encrypted using standard technology.

Where we have given you, or you have chosen, a password which enables you to access your account or certain parts of the Websites, you are responsible for keeping the password confidential and must not share it with anyone. You are responsible for any actions carried out using your password except where there has been fraud.

#### **5. HOW LONG DO WE KEEP YOUR INFORMATION FOR?**

In accordance with our legal data protection and privacy obligations, we will only retain your information for as long as we need it to achieve the purpose(s) for which we obtained it in the first place, as required by law, and for the exercise or defence of legal claims. We will then either securely delete it or anonymise it so that it cannot be linked back to you.

#### **6. MANAGING YOUR INFORMATION**

It is very important to us that all the information we hold about you remains accurate and up to date to reduce the risk of a misunderstanding. We need your help in doing so. If you have an online account with us, please ensure that the information (for example, contact information) you provide to us through that account remains accurate and up to date. Please review and update it regularly.

You have several rights in relation to your personal data under applicable privacy and data protection law, which may be subject to certain limitations and restrictions. Our site is intended for use in the United States and this policy is intended to cover use of personal information of those who reside in the United States. If you are visiting our site from outside the United States, please note that depending on your country of residence or domicile, you may have other legal rights over the information we collect from you and your devices.

We may request proof of identification to verify your request. We reserve the right to charge you a small administration fee to meet our costs in honouring your legal rights, where permitted by the relevant law. We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

If you wish to exercise any of these rights, please [Contact Us](#). We will respond to any valid requests within the time periods required by applicable privacy and data protection law.

If you have any questions or complaints about our use of your information, please [Contact Us](#). We will do our very best to answer any question and resolve any complaint to your satisfaction.

#### **7. THIRD PARTY LINKS**

The Websites may contain links to the websites of third parties. If you follow a link to any third party website, please note that these websites will have their own privacy policies and we do not accept any responsibility or liability in respect of the same.

## 8. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice from time to time. If we make any changes, we will post those changes here and update the “Last Updated” date at the bottom of this Privacy Notice. However, if we make material changes to Privacy Notice we will notify you by means of a prominent notice on the Website prior to the change becoming effective. Please review the Privacy Notice whenever you access or use this Website.

## 9. CONTACT US - UPDATING YOUR PREFERENCES AND DETAILS

If you have any queries about this Privacy Policy; no longer want to participate in our services; or wish to opt out of receiving further information as referred to in this Privacy Policy, please let us know by [Contacting Us](#).

Last Updated: [ July 2021 ]

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