

# PRIVACY POLICY

This Privacy Policy is issued on behalf of The Moon Hub Limited, a company incorporated in England & Wales and having company number 10341057 and its registered office at Plexal 14 East Bay Lane, Here East, London, England, E20 3BS (d/b/a Moonhub) (Moonhub). When we mention “Moonhub”, “we”, “us” or “our” in this Privacy Notice, we are referring to The Moon Hub Limited or the entity responsible for controlling your personal data. All personal data you provide may be transferred or accessed by any Moonhub. If you are a resident of a European Economic Area (“EEA”) country, Moonhub is the controller and responsible for any personal data they collect regarding EEA residents, and may access such personal data in the United Kingdom, subject to our compliance with our obligations under applicable data protection law (including the General Data Protection Regulation) in ensuring adequate safeguards in relation to such transfer.

At Moonhub we are dedicated to safeguarding and preserving your privacy when visiting our site or communicating electronically with us. This Privacy Policy, together with our terms and conditions, explains what happens to any personal data that you provide to us, or that we collect from you when you are on our site (and for the avoidance of doubt, reference to a site in this Privacy Policy includes our Moonhub platform). We do update this Policy from time to time so please do return and review this Policy regularly. This version was last updated 25 May 2020.

This website is not intended for children under the age of 13 and we do not knowingly collect data relating to children under the age of 13.

It is important that you read this Privacy Policy together with any other notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below

## **Information We Collect**

Personal data, or personal information, 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).

In operating our website we may collect and process different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** 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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

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.

## **How is Your Information Collected**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you.
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below
- Technical Data from the following parties:
  - analytics providers such as Google based outside the UK or EU;
- Identity Data from the following parties:
  - Retail partners (if you have raised a question or complaint about our products or services)

## **Use of Cookies**

We may on occasion gather information regarding your computer whilst you are on our website. This enables us to improve our services and to provide statistical information regarding the use of our website to our advertisers where appropriate.

Such information will not identify you personally it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Similarly to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

For further information regarding our use of cookies please refer to our Cookie Policy.

## **Use of Your Information**

We will only use your personal data when the law allows us to. The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may also use the information for the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/ Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
(a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (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) (b) Necessary to comply with a legal obligation</p>

<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact  (c) Technical  (d) Usage  (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Where we need to collect personal data by law, or under the terms of a contract we have with you and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us but we will notify you of this at the time.

## **Marketing**

We may use your data, or permit selected third parties to use your data, so that you can be provided with information about unrelated goods and services which we consider may be of interest to you.

We or they may contact you about these goods and services by any of the methods that you consented at the time your information was collected.

If you are a new customer, we will only contact you or allow third parties to contact you only when you have provided consent and only by those means you provided consent for.

If you do not want us to use your data for our or third parties you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Transferring Your Personal Data Outside the EU under the General Data Protection Regulation**

We may transfer data that we collect from you to locations outside of the UK or European Economic Area (EEA) for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA. Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety.

## **Security of Your Personal Data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

## **Disclosing Your Information**

Where applicable, we may disclose your personal information to any member of our group for the purposes

set out in the table above. This includes, where applicable, our subsidiaries, our holding company and its other subsidiaries (if any).

We may also disclose your personal information to third parties:

- Where we choose to sell, transfer, or merge any or all of our business and/or our assets to a third party.
- Where we are legally required to disclose your information or to protect or defend our legal rights or property, our websites, or those of our customers.
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Our third-party analytics partners to analyse website traffic and understand customer needs and trends or our third-party marketing service providers, advisers or consultants to help us to communicate with customers, including via email marketing and social media marketing.
- We may use Google Analytics. We have activated Google's IP anonymisation function on our Sites which will cause your IP address to be anonymized which means it shall not qualify as personal data. On our behalf, Google will use this information to evaluate your use of the Sites and compile reports based on site

activity and provide us with services relating to website traffic. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

- Credit card payments are directly processed by our third-party payment platforms.
- Government agencies, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

### **Third Party Links**

You might find links to third party websites, plug-ins, and applications on our website. These websites, plug-ins, and applications should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including to comply with our legal, accounting or reporting requirements. We may keep business contacts and information on your account, until you inform us you no longer want us to be in touch or we have determined that your information should be deleted or rectified because it is no longer relevant.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request details of retention periods for different aspects of your personal data by contacting us.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for analytical, research and statistical purposes and to help us to improve our products and services, in which case we may use this information indefinitely without further notice to you.

## **Your Legal Rights under the General Data Protection Regulation**

Under certain circumstances and in the event you are a data subject based in the UK or EU, you have rights under applicable data protection law including the UK General Data Protection Regulation, the Data Protection Act 2018 and the General Data Protection Regulation, respectively, in relation to your personal data.

In particular, you have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c)

where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at the contact details set out below.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

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 a number of requests. In this case, we will notify you and keep you updated.

**Cookies.** Check instructions about your web browser to learn how to prevent placement of, or how to remove, cookies placed on your computer or device by the site. We provide more information in our Cookie Policy.

**Notifications.** If you no longer wish to receive Notifications you may opt-out by turning them off within the settings of your mobile device or browser. These settings may vary depending upon the brand and type of device and/or browser you are using. If you have enabled Notifications on more than one device (such as your phone and your laptop), you will need to opt-out on each device.

### **Contact details**

Should you have any questions, inquiries, or concerns about this Privacy Policy, please email us at [privacy@themoonhub.com](mailto:privacy@themoonhub.com) write to us at:

The Moon Hub Limited  
Plexal 14 East Bay Lane, Here East  
London, England, E20 3BS

## **Complaints**

If you would like to make a complaint about our use of the personal data you should contact our Privacy Officer using the contact details above. If we have not resolved your complaint, you can contact the UK data protection regulator, the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.