

# PRIVACY POLICY

Willinspire Ltd T/A My Fashion Business are committed to protecting and respecting your privacy. This Privacy Policy (together with Our Terms and Conditions and any other documents referred to therein), sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read this Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. As a user of a computerised device that can access this page, such as a computer, smart / mobile phone or tablet device, you are also subject to those providers' privacy policies.

The main, but not sole purpose of Willinspire Ltd T/A My Fashion Business is to provide information, services and offers relating to business and is focused at a UK audience, but not solely limited to those based in the UK. Willinspire Ltd T/A My Fashion Business may use Personal Information (your name, e-mail address, location, telephone number(s), social media preferences and relevant provided information, IP Address, accessing device type and other non stated information) subject to the terms of this privacy policy. We will not rent or share your details with any third party without your prior approval.

For the purpose of the Data Protection Act 1998 (the "Act"), the Data Controller is Willinspire Ltd T/A My Fashion Business.

# Gather information from users

How we collect and store information depends on the page(s) you are visiting, the activities in which you decided to view, request and / or participate and the services provided and will only be held for the period of time in order to run My Fashion Business and the elements within it. For example, you may be asked to provide information when you register for access to certain portions of our digital content / sites or request certain features, such as newsletters or when you make a purchase. You may provide information when you participate in offers, contests, message boards and chat rooms, and other interactive areas of our site.

Like most digital content and channels, Willinspire Ltd T/A My Fashion Business also collects information automatically and through the use of electronic tools that may be transparent to our visitors. As an example, we may log the name of your Internet Service Provider or use cookie technology to recognise you and hold information from your visit. Among other things, the cookie may store your user name and password, that way making things easier so you don't have to re-enter that information each time you visit, it may also control the number of times you encounter a particular advertisement while visiting our site. Statistical data about Willinspire Ltd T/A My Fashion Business users' browsing actions and patterns are not used to identify an individual. We may use such information to track your usage of Willinspire Ltd T/A My Fashion Business services in order to refine and improve services to you. As we adopt additional technology, we may also gather information through other means.

In certain cases, you can choose not to provide us with information, for example by setting your browser to refuse to accept cookies, but if you do you may be unable to access certain portions of the site or may be asked to re-enter your user name and



password, and we may not be able to customise the site's features according to your preferences.

#### **Non-personal Identification Information**

We collect non-personal identification information through the use of, without limitation, the following types of methodology:

Cookie technology: A "cookie" is an element of data that a website can send to your browser, which may then store it on your system.

IP address tracking: An IP address is a number that is assigned to your computer when you are on the Internet. When you request pages from our Sites, our servers log your IP address.

Web beacons: A Web beacon, or "clear gif," is a small graphic image on a webpage or Web-based document that a website can use to determine information about a user.

Non-personal identification information might include the browser you use, the type of computer you use and technical information about your means of connection to our Sites—such as the operating systems and the Internet service providers utilized and other similar information. Our systems may also automatically gather information about the areas you visit and search terms you use on our Sites and about the links you may select from within our Sites to other areas of the Web or elsewhere online.

We use such information for our business purposes and, in particular, primarily to administer the Sites, better manage advertising on the Sites and, in the aggregate, to understand how our users as a group use the services and resources provided on our Sites. This way, we know which areas of our Sites are the favorites of our users, which areas need improvement and what technologies are being used so that we may continually improve our Sites.

We may share this aggregate statistical information with our partners, suppliers and other third parties, but we will not share any individual names, personal navigational or other personal information. For example, we may use a third-party advertising company to serve ads when you visit our Sites. We may share demographic and preference information with this company to allow them to display appropriate advertisements for you.

We use a proprietary advertising server to display ads on our Sites. In addition, advertisers may elect to use third-party advertising companies to serve ads onto our Sites. Some of our advertisers may display ads on our Sites that may use cookie technology or Web beacons to (i) identify nonpersonal information about our users (such as connection speed, browser and country of origin) and (ii) track user behavior within our Sites. Advertisers generally use such information to customise the display of ads within our Sites. We will not permit such advertisers to collect any personal information from our users within our Sites, however, you may choose to voluntarily provide the advertisers with your personal information. We do not have access to these cookies or any information that they may contain.

Further, we currently contract with a third-party Web analytics provider to help manage and optimize our Sites. We use this service to help us measure the effectiveness of our advertising and how visitors use our Sites. To do this, we use Web beacons and cookie technology on the Sites. The type of information we collect



includes the number of hits a webpage receives, the type of browser used and the number of times a visitor makes a purchase from a particular promotion. By supplementing our records, this information helps us learn things like what pages are most attractive to our visitors, which of our products and services most interest our users, and what kinds of offers our users like to see. Although this third-party provider logs the information coming from our Sites on our behalf, we control how that data may and may not be used.

#### What we may and can do with the information we collect

Like other web sites, web publishers and digital publishers we collect information to enhance your visit and deliver more individual, specific or applicable content and advertising. We may use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post, email or telephone.

Aggregated Information (information that does not personally and uniquely identify you) may be used in many ways; as an example, we may combine information about your usage patterns with similar information obtained from other users to help enhance our site and services (e.g., to learn which pages are visited most or what features are most attractive).

We do not disclose information about identifiable individuals to our advertisers, unless you have agreed to this, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

We may use Personally Identifiable Information collected on Willinspire Ltd T/A My Fashion Business's digital assets to communicate with you about your registration and customisation preferences; our Terms of Service and privacy policy; services and products offered by Willinspire Ltd T/A My Fashion Business and other topics we think you might find of interest. Personally Identifiable Information collected by Willinspire Ltd T/A My Fashion Business may also be used for other purposes, including but not limited to site administration, troubleshooting, processing of e-commerce transactions, administration of offers and contests, and other communications with you. Certain third parties who provide technical support for the operation of our site, for example email, hosting, customer relationship management (CRM) services for example) may access such information.

We will use your information only as permitted by law. In addition, from time to time as we continue to develop our business, we may sell, buy, merge or partner with other companies or businesses. In such transactions, user information may be among the transferred assets.

We may also disclose your information in response to a court order, at other times when we believe we are reasonably required to do so by law, in connection with the collection of amounts you may owe to us, and/or to law enforcement authorities whenever we deem it appropriate or necessary. Please note we may not / will not provide you with notice prior to disclosure in such cases.



# When Willinspire Ltd T/A My Fashion Business may disclose your personal information to third parties:

a. in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or

b. if we or substantially all of our assets are acquired by a third party, in which case personal data held by it about our customers will be one of the transferred assets; or

c. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property and safety of Willinspire Ltd T/A My Fashion Business, our customers, users or others.

#### Affiliated sites, linked sites and advertisements

Willinspire Ltd T/A My Fashion Business requires its customers, partners, advertisers and affiliates to respect the privacy of our users. Please note however, that third parties, including our partners, advertisers, affiliates and other content providers accessible through our site, may have their own privacy and data collection policies and practices. For example, during your visit to our site you may link to, or view as part of a frame on a Willinspire Ltd T/A My Fashion Business page, certain content that is actually created or hosted by a third party. Also, through Willinspire Ltd T/A My Fashion Business you may be introduced to, or be able to access, information, Web sites, features, contests or offers offered by other parties. Willinspire Ltd T/A My Fashion Business is not responsible for the actions or policies of such third parties.

You should check the applicable privacy policies of those third parties when providing information on a feature or page operated by a third party.

While on our site, our advertisers, promotional partners or other third parties may use cookies or other technology to attempt to identify some of your preferences or retrieve information about you. For example, some of our advertising is served by third parties and may include cookies that enable the advertiser to determine whether you have seen a particular advertisement before.

Other features available on our site may offer services operated by third parties and may use cookies or other technology to gather information. Willinspire Ltd T/A My Fashion Business does not control the use of this technology by third parties or the resulting information, and is not responsible for any actions or policies of such third parties.

You should also be aware that if you voluntarily disclose Personally Identifiable Information on message boards or in chat areas, that information can be viewed publicly and can be collected and used by third parties without our knowledge and may result in unsolicited messages from other individuals or third parties, as such activities are beyond the control of Willinspire Ltd T/A My Fashion Business and this policy.



# Privacy of Children

We understand that young people need special safeguards and privacy protection. We realize that they may not understand all the provisions of our policy or be able to make thoughtful decisions about the choices that are made available to our adult users. We strongly urge all parents to participate in their children's exploration of the Internet and any online services and to teach their children about protecting their personal information while online.

# Access to/Correction of Information

If you would like to review any personal information we have retained about you in our database, please send us an e-mail request for this information at start@myfashionbusiness.com. To help us address your request, please specify which information you wish to review. Once you have reviewed this information, at your request, we will correct personal information about you that you state is erroneous. To request such a correction, please send an e-mail at start@myfashionbusiness.com. You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request. Please also understand that due to the volume of traffic on the Sites and correspondence received, we cannot make any representations about the timeliness of the making of such modifications. In addition, we are unable to modify your information in the records of any third party who has been provided with your information in accordance with this policy.

# Changes to this Policy

Willinspire Ltd T/A My Fashion Business reserves the right to change this policy at any time. Please check this page periodically for changes. Your continued use of our site following the posting of changes to these terms will mean you accept those changes. Information collected prior to the time any change is posted will be used according to the rules and laws that applied at the time the information was collected.

# Governing law

This privacy policy and the use of Willinspire Ltd T/A My Fashion Business is governed by the laws applicable to England. If a dispute arises under this Policy we agree to first try to resolve it mutually and in further case may seek to use an agreed-upon mediator in the UK (no other geographical location). Any and all costs and fees with the mediation will be paid by the party making the complaint / requesting clarification. If it proves impossible to arrive at a mutually satisfactory solution through mediation, we agree to submit the dispute to binding arbitration in England.

This statement and the policies outlined herein are not intended to and do not create any contractual or other legal rights in or on behalf of any party.