

## DANGLER LIMITED'S EXTERNAL PRIVACY NOTICE AND COOKIE POLICY FOR WEBSITE USERS AND CUSTOMERS

This privacy notice was last updated on: 15/01/20

### INTRODUCTION

Welcome to Dangler Limited's privacy notice.

Dangler Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website or use our App ([www.dangler.co.uk](http://www.dangler.co.uk)) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### 1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how Dangler Limited collects and processes your personal data through your use of this website/App, including any data you may provide through this website/App when you sign up to the marketplace

on the website or App, buy and sell items, received feedback, interact socially with other users, and sign up to any newsletters or promotions.

This website/App is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing 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 notice supplements the other notices and is not intended to override them.

## 1.2 **Controller**

Dangler Limited is the controller and responsible for your personal data (collectively referred to as “Dangler”, “we”, “us” or “our” in this privacy notice).

We do not have a data protection officer (**DPO**), but if you have any questions about this privacy notice, including any requests to exercise [your legal rights](#), please do [contact us](#) using the details set out below.

## 1.3 **Contact details**

Our full details are:

Full name of legal entity: Dangler Limited

Person who correspondence should be addressed to in respect of data protection:  
Harry Hughes

Email address: [info@dangler.co.uk](mailto:info@dangler.co.uk)

Postal address: 10 Riduna Park, Station Road, Melton, Suffolk IP12 1QT

Telephone number: 01473 598105

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([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.

## 1.4 **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on the date stated at the beginning of this privacy notice and historic versions can be obtained by [contacting us](#).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 1.5 **Third-party links**

This website/App may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. **THE DATA WE COLLECT ABOUT YOU**

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). For the full definition of **personal data**, click [here](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender, and location information (including location information from your mobile device).
- **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 by other marketplace users and other details of products and services you have purchased from or sold to other marketplace users.
- **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/and App, products and services, and information you provide when posting an ad,

responding to an ad or other content linked to your account through transactions you carry out on our website/App.

- **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 notice.

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.

## 2.1 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA 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 with us;
  - 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 and your Usage Data in respect of your use of our website. We collect this personal data by using cookies, server logs 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:
    - (a) analytics providers;
      - i. Google Analytics – See their privacy policy [here](#).
      - ii. Facebook Analytics
      - iii. Google Tag Manager – See their privacy policy [here](#).
    - (b) advertising networks; and
    - (c) search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
    - i. Mailchimp – See their privacy policy [here](#).
    - ii. WordPress Admin
  - Transaction and Usage Data from other users who buy products from you or sell products to you via our website or App.

#### 4. HOW WE USE YOUR PERSONAL DATA

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:

- 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.

Click [here](#) to find out more about the types of **lawful basis** that we will rely on to process your personal data.

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](#).

#### 4.1 **Purposes for which we will use your personal data**

We use your personal data in the following ways:

- **personal data that you provide to us** is used to:
  - provide you with the information, products and services that you request from us and from other users of the website/App
  - provide you with marketing information in accordance with your marketing preferences [click here for further information](#).
  - manage and administer our business
  - review and improve our service
- **personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.
- **personal data about your use of our website** is used to:
  - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
  - to improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device
  - to allow you to participate in interactive features of our website, when you choose to do so
  - to provide support services

- as part of our efforts to keep our site safe and secure
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them
- allow you to post and manage ads and other content

## 4.2 How we use your personal data for marketing

We will add your details to our marketing database if:

- you make an enquiry about our services
- you use our services
- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our services
- you have registered an account on our website

and in each case you have indicated that you are happy to receive marketing communications

We may send you marketing communications by e-mail, telephone, automated calls, text message or post.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first register an account on our website. You can check and update your current marketing preferences at any time by logging into your account on our website or by [contacting us](#).

We never share your personal data with third parties for marketing purposes.

## 4.3 Cookies

Our website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and

also allows us to improve the website. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

### **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. If this requires your consent, you are not required to give your consent just because we ask for it. If you do give your consent, you can change your mind and withdraw it at a later date by [contacting us](#).

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.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

- **Internal Third Parties** as set out in the [Glossary](#)
- **External Third Parties** as set out in the [Glossary](#)
- **Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## 6. **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## 7. **DATA SECURITY**

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.

## 8. **DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

If you have any queries about how long your personal data will be stored for, please [contact us](#).

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#). **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.

### 9.1 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.

### 9.2 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.

## 10. GLOSSARY

10.1 **Controller** means, unless otherwise provided by law, the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

### 10.2 Lawful Basis

**Legitimate Interest** means conducting and managing our business in our interests, or the interests of a third party. Our interests could include, for example, our internal administrative purposes, ensuring network and information security or for direct marketing. Whether a particular legitimate interest may exist can also depend on the relationship we have with you (for example, where you are a customer of ours).

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests or the interests of a third party. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

10.3 **Personal data** means any information relating to an identified or identifiable natural person (**data subject**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

10.4 **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

10.5 **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## 10.6 **Third Parties**

### **Internal Third Parties**

Other companies in the Dangler Group acting as joint controllers and who are based in the UK and provide IT and system administration services.

### **External Third Parties**

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services, website development services, website maintenance services, server and hosting services.
- Other account holders who enter into transactions with you for the sale or purchase of products through the website or our App.
- Professional advisers acting as processors including lawyers, bankers, auditors/accountants and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## 10.7 **Your Legal Rights**

You have the right to:

- 10.7.1 **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.
- 10.7.2 **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.
- 10.7.3 **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.

- 10.7.4 **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.
- 10.7.5 **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.
- 10.7.6 **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.
- 10.7.7 **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.

## COOKIE POLICY FOR DANGLER

THIS IS THE COOKIE POLICY FOR DANGLER, ACCESSIBLE FROM [www.dangler.co.uk](http://www.dangler.co.uk)

This document was last updated on: 15/01/20

### What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

### How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case, they are used to provide a service that you use.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the site. Therefore it is recommended that you do not disable cookies.

### The Cookies We Set

- Account related cookies

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Surveys related cookies

From time to time we may offer user surveys and questionnaires to provide you with interesting insights, helpful tools, or to understand our user base more accurately. These surveys may use cookies to remember who has already taken part in a survey or to provide you with accurate results after you change pages.

- Forms related cookies

When you submit data through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

- Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page affected by your preferences.

### Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

The table below explains the cookies we use and why.

Cookie	Cookie Name	Description
Google analytics cookies	__ga, __gid, __ga_*	Used for tracking site usage Page Views & Customer Impressions In accordance with Google's policies - <a href="http://www.google.com/analytics/policies/">www.google.com/analytics/policies/</a>
Facebook cookies	__fbp	Used for data and analytics see <a href="http://www.facebook.com/business/help/471978536642445?id=1205376682832142">www.facebook.com/business/help/471978536642445?id=1205376682832142</a>
Google TagManager cookies	__gat, __gat_gtag*	Used to manage the platform and target relevant content to viewers <a href="http://www.google.com/analytics/tag-manager/use-policy/">www.google.com/analytics/tag-manager/use-policy/</a>

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.

### **More Information**

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information then you can contact us through one of our preferred contact methods:

- Email: [info@dangler.co.uk](mailto:info@dangler.co.uk)