

This privacy policy governs the collection, storage and use of personal information collected by us, One Big Circle Ltd ('OBC'), via our website at [www.onebigcircle.co.uk](http://www.onebigcircle.co.uk). It provides you with details about the personal information we collect from you, how we use your personal information and your rights to control personal information we hold about you. Please read this privacy policy carefully. By accessing or browsing this website, you confirm that you have read, understood and agree to this privacy policy in its entirety. If you do not agree to this privacy policy in its entirety, you must not use this website.

### **Changes to this privacy policy**

This Privacy Policy will be updated from time to time. Any changes will be posted on this website. To keep up-to-date on the current privacy policy, please visit this website periodically.

This privacy policy was last updated on 23rd May 2018.

### **Who we are**

One Big Circle Ltd is a company registered in England and Wales (registration number 11022970), whose registered office is at The Engine Shed, Station Approach, Bristol, BS1 6QH.

We respect your right to privacy and will only process personal information you provide to us in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other applicable privacy laws. We are registered with the Information Commissioners Office (ICO) reference ZA301643.

If you have any questions about how we collect, store and use personal information, or if you have any other privacy-related questions, please contact us at [info@onebigcircle.co.uk](mailto:info@onebigcircle.co.uk)

### **A quick word about children**

We do not and will not knowingly collect information from any unsupervised child under the age of 18. If you are under the age of 18, you may not use this website unless you have the consent of, and are supervised by, a parent or guardian.

### **What is personal information?**

As used in this privacy policy, the term 'personal information' means information that specifically identifies an individual (including, but not limited to, your name and social networking information) or information about an individual that is directly linked to personally identifiable information. Personal information does not include 'aggregate' information, which is data we collect about the use of this website or about a group or category of users, from which individual identities or other personal information has been removed. This privacy policy in no way restricts or limits our collection and use of aggregate information.

### **The personal information we collect about you**

When you access and browse this website (including when you submit personal information to us through data entry fields on the website), we may collect the following information from you:

- your name
- your job title
- your age
- your date of birth
- your gender
- information about the services you wish to buy
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers
- your phone number; and
- your contact information including e-mail details.

### **Information we collect about you**

When you use the website, some information is also automatically collected, for example:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We treat this information as personal information if we combine it with or link it to any of the personal information mentioned above. Otherwise, this information is used in the aggregate only.

### **Information we receive from other sources**

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

### **What personal information do we share with Third Parties**

We recommend you be cautious about giving out personal information to others or sharing personal information in public or private online forums. We will not knowingly share the personal information we collect from you through the website with third parties, except as described in this privacy policy. For example, we may share personal information as follows:

- with advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- with business partners, vendors, consultants, sub-contractors, and other service providers for the performance of any contract we enter into with them or you;
- with analytics and search engine providers that assist us in the improvement and optimisation of our site;
- with vendors, consultants, and other service providers ('Service Providers') who are engaged by or working with us in connection with the operation of this website and who need access to such information to carry out their work for us;
- when you give us your consent to do so (including, without limitation, if we notify you via the website or by email that the information you provide will be shared in a particular manner and you provide such information);
- in an aggregated or anonymised form that does not directly identify you;
- when we believe in good faith that we are lawfully authorised or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes or respond to lawful requests or legal authorities, including responding to lawful subpoenas, warrants, or court orders;
- when we believe in good faith that doing so is reasonably necessary or appropriate to protect the rights, property, or safety of OBC, our users, our employees, copyright owners, third parties or the public including without limitation to protect OBC or our users from fraudulent or unlawful use of the website;

- to enforce or apply this privacy policy, our terms and conditions of use, our loyalty scheme terms and conditions, or our other policies or agreements; and
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition, or in any other situation where personal information may be disclosed or transferred as one of the business assets of OBC.
- with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;

You understand that when you use the website, information you post on the website, information you provide via the use of the website, as well as any information you share with individuals through the website or any information you share through social network websites, will be available to other users and in some cases may be publicly available. We recommend you be cautious about giving out personal information to others or sharing personal information in public or private online forums.

We are not responsible for the actions of Service Providers, YouTube or other third parties, nor are we responsible for any additional information you provide directly to any other users or third parties, and we encourage you to become familiar with other entities and individuals privacy practices including, but not limited to, the privacy practices of YouTube and other content distribution sites and Facebook and other social networking sites before disclosing information directly to any such entity or individual. Nothing herein restricts the sharing of aggregated or anonymised information, which may be shared with third parties without your consent.

### **Cookies**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. 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 our site. We also use cookies which collect information about your browsing habits in order to try and display advertising which is relevant to you and your interests. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of the website.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using them. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to the website, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### **Log files, and passive information collection**

As you use the website certain information can be collected using other technologies such as cookies, clicktags, beacons and server logs. Your browser automatically transmits some information such as the url of the website you came from, your IP address, and the type of browser you are using.

### **Security**

Whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer over the Internet to us.

We have put in place suitable physical and electronic procedures to safeguard and secure the information we collect online.

### **Your rights**

You may opt out of receiving marketing or promotional emails from us by following the instructions in those emails or emailing us at [info@onebigcircle.co.uk](mailto:info@onebigcircle.co.uk). If you opt out, we may still send you non-promotional emails, such as emails about your account or our on-going business relations.

You may choose to restrict the collection or use of your personal information by looking for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes whenever you are asked to fill in a form on the website.

You have the right to ask us to provide you with copies of personal information that we hold about you at any time, subject to a fee specified by law (currently £10). If you would like a copy of the information held on you please write to One Big Circle, The Engine Shed, Station Approach, Bristol, BS1 6QH.

You also have the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge. If you would like to exercise any of the rights above please contact us at the email address below.

### **Third party sites**

This website contains links to other websites operated by third parties. Please note that this privacy policy applies only to the personal information that we collect through this website and we cannot be responsible for personal information that third parties may collect, store and use through their website. You should always read the privacy policy of each website you visit carefully.

### **Questions?**

If you have any questions about this privacy policy, please contact us at [info@onebigcircle.co.uk](mailto:info@onebigcircle.co.uk) .

To make a request for the data we hold on you please email [info@onebigcircle.co.uk](mailto:info@onebigcircle.co.uk) or contact us on 0845 838 7178. We charge a £10 fee for completing this and will provide details for payment once we receive your request.