

# THE LUNATIC LIFESTYLE™

## PRIVACY POLICY

NOV 2018

### PRIVACY POLICY - EU/EEA COUNTRIES

Welcome to the TLL website.

At TLL we are committed to protecting and respecting your privacy. This notice sets out key information regarding TLL and how any personal data you provide to us will be processed.

#### About us

The TLL website is owned and run by BERKSHIRE HATHAWAY LIMITED.

The term "our online services" refers to TLL, our mobile and tablet applications, our pages on third party social media platforms such as Instagram, Facebook, Twitter, Pinterest and Google+ and any other websites or apps we own or run from time to time. The term "our services" refers to our online services and any of our other products and services offered from time to time. If you use any of our services, we will refer to you using the terms "user", "visitor", "you", "your", "yours" in this policy.

For the purpose of the UK Data Protection Act 2018 and the General Data Protection Regulation 2016 (the Law), the data controllers for any personal information we hold about you are BERKSHIRE HATHAWAY LIMITED. CARNATION HOUSE, MILL LANE, BRADFORD, BD5 0HF.

#### What personal data do we collect and why?

We collect your personal data when you place an order, call our Customer Care team, sign up for our marketing communications, browse our website or use the other services offered by our website ([www.thelunaticlifestyl.com](http://www.thelunaticlifestyl.com)). The data we collect includes details you provide to us, such as your given name and surname and your shipping and billing addresses. We also collect data regarding your shopping habits and the pages and products you have viewed from your use of the website. We use this data to:

- Take your orders, process your payments and deliver the items you have purchased;
- Provide any additional services you have requested, such as our marketing communications;
- Give you access to services reserved for registered users, such as Wish Lists and product alerts;
- Provide you with help and assistance via our Customer Care team;
- -Personalize your visit to the website and ensure that content from our site is presented in the most effective manner for you and for your computer.

Under the Law, we must have a valid legal basis to process your data. In most instances, we will process your data because we have a contract with you e.g. to deliver your purchases, or to provide you with other services you have requested. We will also use your personal data to send you sales and marketing communications that we believe may be of interest to you if we have your explicit consent for this activity, or if you are an existing customer where we have a legitimate interest in communicating with you. You can opt out of sales and marketing communications from us at any time.

### **Who will process your data?**

Your personal data will be processed by BERKSHIRE HATHAWAY LIMITED. CARNATION HOUSE, MILL LANE, BRADFORD, BD5 0HF.

We may also retain the services of external suppliers to help meet our business needs and may share your data with these suppliers. These suppliers have been selected after a rigorous evaluation process and chosen for their security, reliability and competence. They will process your data only under our instructions. Some of these suppliers and some Group companies may be based in non-EU countries. Where this is the case, the transfer of your personal data to these countries is carried out in compliance with the guarantees provided by law.

### **How long do we keep your data?**

We will not retain your personal data for longer than is necessary to fulfil the purposes for which you provided that personal data, unless the law permits or requires that we retain it for longer. The retention period varies depending on the purpose of the processing. For example, the data collected during your purchase of goods on [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) are retained in accordance with local tax law (seven years in the UK), while those data used to send you our marketing communications are retained until you ask to be unsubscribed.

### **What are your rights regarding your personal data?**

Under the Law, you have the right to:

- Know what personal data of yours we are processing, where that data came from and how we are using that data;
- Ask us to update, correct or supplement the data we hold about you;
- Withdraw consent for processing for a specified purpose;
- Ask us to delete or erase your data from our systems;
- Limit or oppose our processing of your data;
- Ask us to supply the personal data we hold about you in an easy readable electronic format, or transfer that data direct to a third party nominated by you.

You can exercise these rights at any time by contacting us: TLL, PRIVACY, CARNATION HOUSE, MILL LANE, BRADFORD, BD5 0HF.

If you believe that the processing of your personal data has been carried out unlawfully, you can file a complaint with the supervisory authority responsible for compliance with the rules on personal data protection in your jurisdiction. In the UK, the complaint should be presented to the Information Commissioner's Office (<https://ico.org.uk/>).

This Privacy Policy may undergo changes and additions from time to time. Where possible we will inform you of any changes, but please check the contents periodically. The date of issue and version number are shown at the beginning of the notice.

## **PRIVACY POLICY: TLL**

Welcome to the TLL website.

At TLL we are committed to protecting and respecting your privacy. This notice describes what personal data we collect, how we will use that data and how we keep your data safe. For additional information on how we use cookies please refer to our Cookie Policy. For all other information regarding our services, please refer to our Terms and Conditions.

If you have a question that is not answered here, or if you would like more information about how we collect, use and store your personal data, you can contact us TLL, PRIVACY, CARNATION HOUSE, MILL LANE, BRADFORD, BD5 0HF.

In this Privacy Policy we will cover:

### **1. Who is the data controller?**

Under the data protection law, the data controller is responsible for ensuring that your data is held securely, that you are given accurate information about how your data is used, and that your rights regarding your data are respected.

The TLL website is owned and run by THE TLL GROUP LIMITED. For the purpose of the UK Data Protection Act 2018 and the General Data Protection Regulation 2016 (the Law), the data controllers for any personal data we hold about you are BERKSHIRE HATHAWAY LIMITED.

The term "our online services" refers to TLL, our mobile and tablet applications, our pages on third party social media platforms such as Instagram, Facebook, Twitter, Pinterest and Google+ and any other websites or apps we own or run from time to time. The term "our services" refers to our online services and any of our other products and services offered from time to time. If you use any of our services, we will refer to you using the terms "user", "visitor", "you", "your", "yours" in this policy.

For the purpose of the UK Data Protection Act 2018 and the General Data Protection Regulation 2016 (the Law), the data controllers for any personal information we hold about you are BERKSHIRE HATHAWAY LIMITED. CARNATION HOUSE, MILL LANE, BRADFORD, BD5 0HF.

### **2. What personal data do we collect?**

We collect and process only the data that is required to allow us to provide our services to you. We collect the following data when you browse or shop at [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com)

- We process the personal data required to complete and despatch your purchase, including your name, billing address, delivery address, payment details, mobile number, telephone number and email address. We collect your email address in order to send you confirmation of your order; we collect your telephone number so that we can contact you if there are any issues with the order.
- We collect your email address when you sign up to receive TLL News.
- If you register for a TLL account, we collect your name, email address, password, country and additional data regarding your favourite designers and your marketing preferences.
- When you contact our Customer Care team, we may collect additional data to help us resolve any queries relating to your order, delivery, payments, marketing, the website or any other queries.
- We collect and process data about your browsing on [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com), including the pages you visit and how you interact with these pages. If you have registered for an account, we collect browsing data about your access to the dedicated areas of the website.
- If you are a customer of [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com), or if you have given us your consent, we collect and process your personal data for direct marketing activities.
- If you provide us with someone else's data - for example, if you purchase a product to be delivered to a friend or as a gift - we will collect and process the personal data required to complete the transaction such as the name, delivery address and other contact details for your friend.

If you are receiving an item as a gift, we will process your data only to fulfil the gift request and our contractual obligations.

- When you use the App version of our website, we will ask for your consent to collect personal data from you in order to send you brief messages, "push notifications" about products and services that we believe may be of interest to you. With your consent, we will also collect data regarding your use of the App and your IP address, in order to improve our service to you. You can disable push notification at any time by updating the App settings in your mobile device.
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- When you call our Customer Care team, your call will be recorded for training and fraud prevention purposes.

### 3. How do we use the personal data we collect?

We collect and process your personal data for the following purposes:

- When you purchase a product from [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) we ask you for the personal data necessary to allow us to fulfil our contract with you including taking payment, any related anti-fraud checks if you choose to pay by credit/debit card, billing, shipping and delivery of the product and possible handling of the return.
- When you visit [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com), we will collect the minimum personal data necessary to allow us to provide you with the services of the website, such as placing and holding items in your shopping bag.
- When you visit [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com), we will use some data about your use of the website to help us improve the website and our promotion of the website. This will include data about how you came to the website; the date and time of your visit; products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction data (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- We also collect data about your use of [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) by using cookies. More information about how we use cookies and how you can, if you wish, turn off cookies is included in our [Cookie Policy](#).
- When you register on [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) we will collect the data necessary to ensure that we can recognise you on return visits and provide you with the services registration offers, such as creating a Wish List or subscribing to emails about your favorite designers. If you would prefer not to continue receiving these emails, you can unsubscribe at any time using the link on the bottom of the email, or by contacting our Customer Care team.
- When you sign up for our marketing communications, we will ask you for your email address. If you would prefer not to receive these emails, you can unsubscribe at any time using the link on the bottom of the email, or by contacting our Customer Care team.
- If you have purchased from [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) we will use the personal data we hold about you, including your purchase history, to contact you regarding products and services that may be of interest to you. This contact will normally be via email, but in certain circumstances we may contact you via other methods e.g. we may call you if an item we know you have been eager to purchase comes back into stock. If you would prefer not to be contacted in this way, you can unsubscribe from emails at any time using the link on the bottom of the email, or update your contact preferences on [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) or by contacting our Customer Care team.
- We analyze contact data, purchase history, web browsing data and lifestyle data to tailor our marketing communications, web site presentation and internet advertising to meet your preferences. For example, if you have been browsing or have previously purchased a particular shoe designer, we may send you an email to tell you that these are now on sale or display similar products to you as part of our internet advertising.
- When you contact our Customer Care team, we will use the personal data you provide and that we have collected to respond to your requests for help or information.
- When you use the App version of our website, we will collect data regarding your use of the App and your IP address, in order to send you push notifications about products and services that we believe may be of interest to you.
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- When you call our Customer Care team, your call will be recorded for training and fraud prevention purposes.
- We will use the contact information that you provide to deliver service messages such as any change to our Terms and Conditions or Privacy Policy, delivery updates or other non-marketing communications.

#### 4) What is our legal basis for processing your personal data?

Under the Law we must have a valid reason for using your personal data and we may not collect, store or use data about you that is not compatible with that reason. There are four valid reasons for our use of your personal data:

- Most of the data we collect from you is necessary to allow us to fulfil our contract with you or to enter into a contract with you e.g. you provide a billing address and email address when you purchase an item from [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) so that we can process your payment and send you your order confirmation.
- In certain circumstances we will ask for your permission or consent to use your personal data e.g. if we would like to send you marketing information about items we believe may be of interest to you via email. If you have given your consent to our use of your personal data, you are entitled to withdraw this consent at any time.
- We may also have a legitimate interest in using your personal data e.g. to ensure that the content of our website is presented to you and your device as effectively as possible, or to ensure that our marketing communications are relevant to your interests. If this is our reason for using your data, we must make sure that our interests do not override yours and you are entitled to object to this use of your data.
- Lastly, we may be required to use your data to meet a legal obligation or to protect your interests e.g. we may exchange data with other specialist organisations for the purposes of fraud detection and credit risk reduction and we will retain financial data long term to meet our statutory obligations.

The legal basis for each of the ways in which we use your personal data is as follows:

Our use of your data	Our legal basis for processing
<p>a) When you purchase a product from <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we ask you for the personal data necessary to allow us to fulfil our contract with you including taking payment, completing any related anti-fraud checks if you choose to pay by credit/debit card, billing, shipping and delivery of the product and possible handling of the return.</p>	<p>1. The provision of your personal data for these activities is a contractual obligation. You are free to communicate your data or not, but in the absence of the requested data it will not be possible to finalise or execute the contract and your requests. This means that while you will continue to be able to browse <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> you will not be able to purchase products and you will not be able to use the services of our website such as the Wish List.</p> <p>2. When you make a purchase at <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we are required to process your personal data to meet our legal obligations in accordance with the tax provisions and other statutory rules which apply. You are free to decide whether or not to purchase from us, but if you do make a purchase this use of your data will be necessary to meet our legal obligations.</p> <p>3. When you make a purchase at <a href="http://www.TLL.com">www.TLL.com</a>, we will use some of your personal data to carry out anti-fraud activities: we have a legitimate interest in carrying out this activity to prevent and prosecute any fraudulent activity.</p>
<p>b) When you visit <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we will collect the personal data necessary to allow us to provide you with the services of the website, such as placing and holding items in your shopping bag.</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that the service we provide to you is managed correctly.</p>

<p>c) When you visit <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we will use some data about your use of the website to help us improve the website and our promotion of the website. This will include data about how you came to the website; the date and time of your visit; products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction data (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that the service we provide to you is managed correctly.</p>
<p>d) We also collect data about your use of <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> by using cookies. More information about how we use cookies and how you can, if you wish, turn off cookies is included in our Cookie Policy.</p>	<p>You have given your consent to our use of cookies via the cookie banner that appears on the website. You can choose which cookies to accept via our Cookie Policy. Some cookies are necessary for our legitimate interest in ensuring that the service we provide to you is administered correctly e.g. retaining items in your shopping bag.</p>
<p>e) When you register on <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we will collect the data necessary to ensure that we can recognise you on return visits and provide you with the services registration offers, such as creating a Wish List or subscribing to emails about your favorite designers. If you would prefer not to continue receiving these emails, you can unsubscribe at any time using the link on the bottom of the email, or by contacting our Customer Care team.</p>	<p>The provision of your personal data for these activities is a contractual obligation. You are free to communicate your data or not, but in the absence of the requested data it will not be possible to finalize or execute the contract and your requests. This means that while you will continue to be able to browse <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> you will not be able to use the services of our website such as the Wish List or alerts about deliveries from your favorite designers.</p>
<p>f) When you sign up for our marketing communications, we will ask you for your email address to enable delivery of our marketing communications. If you would prefer not to receive these emails, you can unsubscribe at any time using the link on the bottom of the email, or by contacting our Customer Care team.</p>	<p>You have given your consent and asked us to send you our marketing communications.</p>
<p>g) If you have purchased from <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> we will use the personal data we hold about you, including your purchase history, to contact you regarding products and services that may be of interest to you. This contact will normally be via email, but in certain circumstances we may contact you via other methods e.g. we may call you if an item you have been eager to purchase comes back into stock. If you would prefer not to be contacted in this way, you can unsubscribe from</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that you receive information about goods and services that may be of interest to you.</p>

<p>emails at any time using the link on the bottom of the email, or update your preferences via <a href="http://www.thelunaticlifestyle.com">www.thelunaticlifestyle.com</a> or by contacting our Customer Care team.</p>	
<p>h) We analyze contact data, purchase histories, web browsing data and lifestyle data to tailor our marketing communications, web site presentation and internet advertising to meet your preferences. For example, if you have been browsing or have previously purchased a particular shoe designer, we may send you an email to tell you that these are now on sale or display similar products to you on our website or as part of our advertising on other websites.</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that you receive information about goods and services that may be of interest to you.</p>
<p>i) When you contact our Customer Care team, we will use the personal data you provide and that we have collected to respond to your requests for help or information.</p>	<p>The provision of your personal data for these activities is a contractual obligation. You are free to communicate your data or not, but in the absence of the requested data it will not be possible to finalise or execute the contract and your requests.</p>
<p>j) When you use the App version of our website, we will collect data regarding your use of the App and your IP address, in order to send you push notifications about products and services that we believe may be of interest to you.</p>	<p>You have given your consent to push notifications.</p>
<p>m) When you call our Customer Care team, your call will be recorded for training and fraud prevention purposes.</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that our employees receive adequate training and for fraud prevention.</p>
<p>n) We will use the contact information that you provide to deliver service messages such as any change to our Terms and Conditions or Privacy Policy, delivery updates or other non-marketing communications such as fraud prevention checks.</p>	<p>Our use of your data is necessary for our legitimate interest in ensuring that you receive information relating to our contract with you.</p>

## 5) Who will process your data?

Your personal data will be processed by the internal staff of Berkshire Hathaway Limited

Your personal data will also be transmitted to third parties that we use to provide our services; these parties have been rigorously assessed and offer a guarantee of compliance with the legislation on the processing of personal data. These parties have been designated as data processors and carry out their activities according to the instructions given by Berkshire Hathaway Limited and under our control.

The third parties in question belong to the following categories: banking operators, internet providers, companies specialising in IT and telematics services; couriers; companies that carry out marketing activities, including social media organisations; companies specialising in market research and data processing; companies offering contact centre services; companies providing publishing and distribution services.

Under some circumstances we may be required to disclose or share your data without your consent, for example if we are required by the police, the courts or for other legal reasons. Your data may be transmitted to the police, judicial and administrative authorities, in accordance with the law, for the investigation and prosecution of crimes, the prevention of and protection from threats to public security, to allow Berkshire Hathaway Limited to ascertain, exercise or defend a right in court, as well as for other reasons related to the protection of the rights and freedoms of others.

We may also transfer your personal data to a buyer or potential buyer in the event that our assets are acquired by another organisation. The purchaser will be required by law to use your personal data only as described in this Privacy Policy

## 6) Data transfer outside the European Union

Some of the third parties listed in the previous paragraph 'Who will process your data?' may be located in countries outside the European Union that nevertheless offer an adequate level of data protection, as established by specific decisions of the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en))

The transfer of your personal data to countries that do not belong to the European Union and that have not been assessed as offering adequate levels of protection will be performed only:

I. after the completion between Berkshire Hathaway Limited and said parties of specific agreements containing safeguard clauses and appropriate guarantees for the protection of your personal data (known as "standard contractual clauses" and approved by the European Commission), or

II. if the transfer is necessary for the completion and execution of a contract between you and Berkshire Hathaway Limited (for the purchase of goods offered on our website, for registration on the website or use of services on the website), or

III. for the management of your requests.

## 7) How long do we keep your data?

We keep your personal data for a limited period of time in line with our data retention policy. The specific retention period will vary according to the reason for processing your personal data. After this period, your data will be permanently erased or otherwise irreversibly rendered anonymous.

Your personal data are retained in accordance with the following criteria: When you have purchased goods from [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) we will retain the billing data until the end of the relevant accounting period, normally seven years from the billing date;

When you make a payment, we will retain your payment details up to the certification of the payment and the completion of the relevant administrative-accounting formalities regarding your right of withdrawal and the terms applied for the disputing of the payment;

When you provide us with personal data in order to use the services of [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) such as marketing communications, we will keep your data for this purpose until the termination of the service or until you cancel your subscription to the service;

When you give us your consent to send you marketing communications, you can withdraw your consent at any time. We will consider your consent to be current for five years from your last interaction with any email that we send you, with our App or with [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) In any case, we will reduce the number of marketing contacts after six months if you don't interact with us;

When we use your personal data and browsing history to analyse your behaviour in order to customise the website and to show you personalized sales offers, we will keep the data for analytical purposes until you ask us to delete it;

When we use personal data for market research and satisfaction surveys, we will keep the data until you ask us to stop.

When you contact our Customer Care team, we will keep any additional personal data you provide that is specific to your inquiry for as long as you remain an active customer of [www.TLL.com](http://www.TLL.com).

When you contact our Customer Care team, we will keep the call recording for six months. Credit card details are not recorded as part of the call.

## **8) Your rights**

You have the right to request a copy of the data that we hold about you (and we will provide this to you free of charge once we have confirmed your identity).

If you would like a copy of some or all of your personal data, please email or write to us using the contact details in this policy.

If we do hold data about you we will:

- -give you a description of it
- -tell you why we are holding it
- -tell you who it could be shared with
- -tell you how long we will keep the data
- -if the data was not provided by you, we will give you any available information such as the source of the data
- -tell you if the data has been used for automated decision making
- -tell you if the data is stored outside of the European Economic Area, and if so what safeguards are in place to protect your personal data
- -let you have a concise and clear copy of the data

You have the right to ask us to correct any inaccuracies in the personal data we hold about you and to stop us using your data until it has been corrected. We want to make sure that your personal data is accurate and up to date and we will be happy to correct or remove data you think is inaccurate.

If you have given us your consent to use your personal data for marketing, you have the right to withdraw your consent at any time by calling our Customer Care team, clicking "unsubscribe" on a marketing email or replying STOP to a text message. Alternatively, you can sign into your account on [www.TLL.com](http://www.TLL.com) and update your requirements in our Email Preference Centre. You may receive a small number of further communications immediately after unsubscribing but we will implement your request as quickly as possible.

You have the right at any time to oppose our processing of your personal data on the basis of our legitimate interest. You will need to explain the reasons behind your request and allow us to consider your request and respond.

You have the right to request the deletion of your personal data. After receiving and reviewing your request, if legitimate it will be our responsibility to promptly cease processing and to delete your personal data.

You have the right to receive a copy of your data that we process based on your consent or on the basis of a contract with you in a standard format. If you wish, where technically possible, we can transfer your data directly to a third party indicated by you.

To exercise any of these rights, you can sign in to your account, contact our Customer Care team at [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com)

To ensure that the data of our users are not subject to breaches or illegitimate use by third parties, we will ask you to confirm your identity before carrying out your request.

## **9) Security**

We protect your personal data with specific technical and organisational security measures aimed at preventing your personal data from being used illegitimately or fraudulently.

In particular, we use security measures that guarantee: pseudonymisation or encryption of your data; the confidentiality, integrity, and availability of your data as well as the resilience of the systems and services that process them; the ability to restore data in the event of a data breach. Furthermore, Berkshire Hathaway Limited undertakes to test, verify and regularly evaluate the effectiveness of technical and organizational measures in order to guarantee continuous improvement in the safety of processing.

## 10) Complaints

If you believe that Berkshire Hathaway Limited is processing your personal data in contravention of the Law, you can file a complaint with the supervisory authority responsible for compliance with the rules on personal data protection.

In the UK, the complaint can be presented to the ICO. More information on how to complain is available on the ICO's website at <https://ico.org.uk/>. According to the Law to which the Controller YOOX TLL GROUP S.p.A. is subject, you can also contact the Italian Data Protection Authority. More information is available on the website of the Garante Privacy, at <http://www.garanteprivacy.it/>

## 11) Changes to this notice

We keep our Privacy Policy under regular review in order to reflect changes in our services and in privacy regulation. This Privacy Policy was last updated on NOV, 2018

## 12) Legislative references and useful links.

The processing of your personal data is carried out by Berkshire Hathaway Limited in compliance with the Regulation (EU) 2016/679 general regulation on data protection, UK Data Protection Act 2018 and rules on the processing of personal data (<https://ico.org.uk/>).

## OTHER REGIONS

This website is owned and run by Berkshire Hathaway Limited, our mobile and tablet applications, our pages on third party social media platforms such as Instagram, Facebook, Twitter, Pinterest and Google+ and any other websites or apps we own or run from time to time. The term "our services" refers to our online services and any of our other products and services, offered from time to time. If you use any of our services, we will refer to you using the terms "user", "visitor", "you", "your", "yours" in this policy.

We respect the privacy rights of our visitors and recognise the importance of protecting the information collected about them. This privacy policy is about how we collect, store, and use the personal information that you provide to us. As part of our commitment to your privacy rights and security, our websites have been certified by Cybertrust.

This privacy policy explains:

If you are under 16, you must inform a parent or guardian about our privacy policy to obtain their agreement to the privacy policy before registering, subscribing or placing an order with us.

## PERSONAL INFORMATION WE COLLECT AND HOW

We collect personal information about you when you register or subscribe for one of our services, place an order, buy a gift voucher, use our online services, interact with us in any other way, such as via social media, click on an advert that we put on our or someone else's website, use our Personal Shopping services, ask for information or assistance, give us a testimonial or other feedback, comment on any blogs or articles featured in our services, attend an event that we run or sponsor, enter competitions or special promotions, sign up for our special offers or other updates, participate in research panels or fill in surveys. By registering, subscribing or using our services, you consent to the use of your personal data in line with this policy. We may also receive information about you from our Group and from third parties, with whom we have a business relationship.

The information we collect and hold about you may include your name, email address, phone and mobile phone numbers, home address, shipping and payment card billing address, payment card details, IP address, search criteria, shopping history, shopping preferences, sizings, responses to research panels and surveys, the type of browser you use (a browser is the program you use to look at websites, such as Internet Explorer, Firefox or Safari), the times when you access the site and for how long, your referring URL (the site you come from to reach our website), cell IDs (these are the unique identifiers of the telecommunications towers being used by your mobile phone when you use our locations-based services on your mobile phone or tablet) and other location information (for example, GPS measurements), photographs and other content you share with us when you use our services, date of birth, password details, answers to security questions and any other information you may give us.

We may record or monitor calls that you receive from us or make to us. We do this for security and training purposes, and to improve the services we provide to you.

## COOKIES

We and our business partners collect information about your use of our online services using cookies. Cookies are very small files that are sent by us to your computer or other device which we can access when you visit our site in future. Cookies help us remember who you are and other information about your visits. They can help display the information on a website in a way that matches your interests. Most major websites use cookies.

For more information about how we use cookies, please read our [Cookie Policy](#)

## HOW INFORMATION MAY BE USED

Whenever you give us your personal information we will use it in accordance with applicable privacy laws and for the purposes set out in this policy, on the data entry forms you complete, in any relevant terms and conditions and on pages or emails which link to the data entry forms.

**When you use our services:** If you use any of our services, register for or attend one of our events, set up, look at or change your account details or contact your personal shopper or a member of our Customer Care team, we will record your personal details. Your information will be used in the first place to provide the products, services or information you have asked for and to provide you with a personalized shopping experience. We keep the information you provide and may use it for several purposes, including: (i) accounting, billing, reporting and audit; (ii) credit checking or screening; (iii) authentication and identity checks; (iv) credit, debit or other payment card verification and screening; (v) debt collection; (vi) safety, security, health, training, administrative and legal purposes; (vii) data matching and dedupe, statistical and market analysis, and marketing information; (viii) advertising and marketing for us, our Group and third parties; (ix) developing, testing and maintaining systems; (x) studies, research and development; (xi) customer surveys; (xii) customer care and to help us in any future dealings with you, for example by identifying your requirements and preferences; (xiii) where required by law or in connection with legal proceeding or disputes; and (iv) any other uses set out in the terms and conditions for use of our services. For these purposes we may disclose your information to one or more of the other organisations listed in the section called "who we will share your personal information with".

Saved payment card details will only be shared with our payment partner and not with any other third parties and will only be used to process your order, using our payment partner's systems.

We may also use your personal information to send you marketing updates, as detailed in the next section.

**Tracking how our online services are used:** We collect, and use third parties to collect and share with us, information from lots of visitors to our online services and analyse it to build up a picture of how people use our websites. This helps us improve the services we offer. We may also give anonymous statistics about visitors to other, reputable organisations, but the information we provide will not include details that would allow these organisations to identify you. For more information on our use of cookies, please read our [cookie policy](#).

**Customization of our online services and advert targeting:** We may use the information you give us about yourself and the information we collect via cookies when you use our online services to build up a picture of your interests. We may then use this information to try to make sure that when we send you marketing communications and when you visit our websites or use our online services, you don't miss offers and information that might interest you. This information may also be used by our third party advertising agencies and networks, to advertise our own or third party products and services to you when you visit third party websites and online services. This is called advert targeting or interest-based advertising. For more information on how to reject targeted advertising or interest-based advertising cookies please read our [cookie policy](#).

**Testimonials:** If you give us feedback, we may use it to improve our services and we may publish it online or offline to promote our business and our services. We will ask for your permission before we publish it.

**Comments and reviews submitted to our online services:** If you wish to submit a comment or feedback on a blog or article featured on our services, we may (but are not obliged to) publish your comment online or offline to promote our business and our services. We will collect your name or username which will be displayed next to your comment and e-mail address, which will not be published, but which we may use to contact you in relation to your comment.

**Mobile services:** When you request our mobile services, we may keep your mobile phone number, the make and model of your phone, the operating system used by your phone and details of your network operator, and we will link a unique identifier to your mobile phone number. We'll store your device language, app language, country, We need this information in order to provide the features and services enabled through our mobile services and to administer our mobile service. Our Givenchy mobile services use your location to show your closest Givenchy store. We may also use it for SMS or voice marketing and market research.

**Social networks:** If you follow us or interact with us on any of our pages on third party social media platforms, such as Instagram, Facebook, Twitter, Pinterest and Google+, information you provide will be subject to the third party's privacy policy, as well as this privacy policy.

**Direct marketing:** For information on how we may market to you, please read the section called “marketing opt-in and opt-out provisions”.

**Customer surveys:** Every now and again, we may ask you for your opinion on our services and the products you have purchased through our services. When we do research or surveys, we may use cookies and may combine the information collected by those cookies with your answers.

## **SHARING INFORMATION**

We will share your information with other companies in our Group, who may use it for their own business purposes, as set out in their privacy policy. These purposes may include financial reporting and analysis, strategic planning, the development of customer segmentation and metrics to provide a consistent view of our customer base, research and analytics, to help us source the right products in future and make better product recommendations, more effective targeting of our marketing campaigns, the creation of inspiring content and editorial features, the development of new products and collaboration opportunities with designer brands. It will also be used to provide more tailored marketing by phone, post, email, SMS or any other means (electronic or otherwise) and you expressly agree to such use.

From time to time, we may engage third party business partners to provide information about you or to collect personal information on our behalf. We may also share or match your data with third party business partners to provide you with the products, services or information you ask for or for interest-based advertising. We may pass your information onto one or more of the following organisations: (i) data processing companies, mailing houses and other third party suppliers working on our Group’s behalf; (ii) ad-serving agencies and other advertising intermediaries; (iii) credit reference or fraud prevention agencies, which may keep a record of that information; (iv) research students, universities and other research and development organisations; (v) regulatory bodies, government and enforcement agencies, such as the police.

Every now and again, we receive requests for information from government departments, the police and other enforcement agencies. If this happens, and there is a proper legal basis for providing your personal information, we will provide it to the organisation asking for it.

We collate information about site traffic, sales, wish lists, and other commercial information which we may pass onto third parties, but this information does not include any details which can identify you personally.

## **WHERE IS INFORMATION PROCESSED**

When we use your information as described in this policy, this may involve sending your information outside the European Economic Area (EEA). When we do this, we make sure that appropriate steps are taken to protect your personal information and your rights. By providing us with your personal information, you agree that we may transfer, store and process your information outside the EEA. Governments in certain countries such as the USA have broad powers to access data for security, crime prevention and detection and law enforcement purposes.

## **MARKETING OPT IN AND OPT OUT**

We offer you the chance to receive news and fashion updates which, depending on your preferences, we will discuss with you by phone or live chat or send to you via email, SMS and/or direct mail. These include alerts for new products, features, enhancements, special offers, upgrade opportunities, contests, events of interest, and one-off marketing promotions. You can opt-out of receiving these updates, if you wish.

We, or our third party business partners, may also ask you if you want to receive marketing if you enter a promotion or attend an event thrown or sponsored by us. Other companies in our Group may also pass your personal information to us for marketing use.

Marketing communications you subscribe to will only be sent by our Group.

You have the right to ask us not to use your personal information for marketing. At all times, we will offer you the opportunity to unsubscribe from any service or update to which you have subscribed, if you change your mind. Whenever you receive direct marketing from us, we will tell you how to unsubscribe. Alternatively you can change your marketing preferences by logging into My Account. To opt out of direct mail, please contact our Customer Care team: [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com)

## **ACCESSING YOUR INFORMATION AND KEEPING IT UP TO DATE**

You have the right to see information we hold about you, with some exceptions which are described in the privacy laws. If you would like a copy of your personal information, please contact our privacy officer at [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) You will need to pay a processing fee.

You have the right to review and update your personal details. If for any reason you are concerned that the personal information we hold is not correct, please visit our online services and, after logging into the site using the "Sign In" menu on the home page, your personal information will be made available for review and change in the "My Account" section. Only you or, upon your request, our Customer Care team, may access your personal data from our online services using your user ID and password. Information may be changed online within "My Details", "Shipping Details" and "My Email Preferences". You can change or delete saved credit/debit card details each time you make a purchase. You will also be able to delete saved credit/debit card details by adding or editing a shipping/billing address. If you change your billing or shipping address while your order is still being processed, the order will be re-processed through security validation checks. If you prefer, you may contact us by feedback on [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) and we will amend your personal details.

## **SAFEGUARDING YOUR PERSONAL INFORMATION**

We will take reasonable care to maintain appropriate safeguards to ensure the security, integrity and privacy of the information you have provided to us. We have put in place technology and security policies which are designed to protect the personal information we hold about you. We also follow the security procedures that applicable privacy laws require. These cover storing, using and releasing any information you have provided and, as well as measures designed to prevent unauthorised access or use. When you place an order or access your account information, we use a Secure Socket Layer (SSL) encryption which encrypts your information before it is sent to us to protect it from unauthorised use.

## **LINKING WITH OTHER SITES**

Our online services contain hyperlinks to websites that are owned and operated by other organisations. These websites have their own privacy and cookie policies, and we urge you to read them. They control how your personal information is used when you give it to these other organisations or they collect it with cookies. We do not approve any other websites and we are not responsible for any information, material, products or services that are on or accessible through those websites or for the privacy practices of websites run by other organisations. If you use these other websites you do so at your own risk.

## **POLICY CHANGES**

We may update this privacy policy from time to time so you may want to check it each time you give us personal information or use our websites.

## **CONTACTING US REGARDING THIS POLICY**

If you require further information about our privacy policy, please go to the help section of our websites where FAQs are answered. We welcome your questions, comments and requests about this privacy policy. If you require more information, please contact our privacy officer by feedback [www.thelunaticlifestyle.com](http://www.thelunaticlifestyle.com) or write to us:

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