



ATELIER  
TECHNOLOGY

*Privacy Policy*

## **Privacy & Cookie Policy**

Atelier Technology Limited ("we", "our", "us") respects the privacy rights of its online visitors ("you", "your", "yours") and recognise the importance of protecting the information collected about them. We have adopted a corporate wide "Privacy Policy" that guides how we collect, store, and use the information that you provide us with.

The following information is provided by us to enable our online visitors to be fully informed of our privacy processes. By visiting <https://atelier.technology> (the "Website") and using the platform and the services available through the Website, you are accepting and consenting to the practices described in this Privacy Policy and the Terms and Conditions.

You acknowledge that, as an employee or contractor accessing the Website on behalf of a business that has subscribed to services that we provide through the Website, we will be a data controller in respect of the personal data you provide to us in order to access, or in the process of accessing, those services.

We keep this Privacy Policy under regular review. This version was last updated in October 2020. Any change to this Privacy Policy will be on this webpage and a notice that this Privacy Policy has been updated will be clearly shown on the Website. If we provide you with communications by email, we may also inform you of any changes by email.

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.

You can contact us by using the details set out in paragraph 7 below.

### **Contents**

1. What personal information do we collect from you and how?
2. What about Cookies?
3. How this information may be used, including anyone it might be shared with
4. Marketing opt-in and opt-out provisions
5. How you can access and if necessary, change the personal information we maintain
6. Safeguarding your personally identifiable information
7. Where and how to ask questions or file complaints
8. Your rights

This Privacy Policy does not apply to websites maintained by other companies or organisations to which we link and we are not responsible for any personal information you submit to third parties via our website. Please ensure that you read the Privacy Policy of such other companies or organisations before submitting your details.

As an employee or contractor accessing the Website on behalf of a business that has subscribed to services that we provide through the Website, during the course of your access and use of the Website you may pass your personal data to other users of the Website and the services available through it. Those other users may be located outside of the European Economic Area and therefore such personal data may be processed outside of the European Economic Area by such users. Whilst we have asked other users of the Website to comply with relevant data protection

laws in their use of the Website and their processing of any personal data during their use of the Website, we are not responsible for such compliance. Please ensure that you read the privacy policy of any such other user of the Website before sharing your personal data.

## **1. What Personal Information do we collect from you and how?**

We collect personal information in several ways when you place an order, use our personalisation services including photographic images, or register for a service offered by us. By registering or by contributing personal data such as your email address, you acknowledge that we will use your personal data in accordance with this Privacy Policy. We may also have been provided with your personal information by your employer, in registering you for access to the services we make available through the Website. Your employer will have shared that information with us on the basis of internal privacy statements, over which we have no control; once your employer has provided your personal information to us, we will use your personal information in accordance with this Privacy Policy.

Sometimes we may ask for your telephone number. This number is used solely for the purpose of enabling two factor authentication, which is an improved security measure in addition to a user account password. We will use this number to send you a unique code to verify that the attempted login to your account is actually you. This is only required should your administrator activate the additional security measure for the company where you are employed.

If you do not provide us with your personal data when we ask for it, we may not be able to give you access to sections of the Website or the services available through it.

We use the personal data you give us to manage our relationship with you, and to administer and protect our business, the Website and the services available through it,

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:

- a) Where we need to perform the contract we are about to enter into or have entered into with you or the business on whose behalf you are accessing the Website.
- b) 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.
- c) Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before 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.

## **2. What about Cookies?**

The Website uses cookies (very small files that are sent by us to your computer or other access device) which we can access when you visit the Website in future. There are four types of cookies:

### *Website functionality cookies*

These cookies enable you to browse the Website and use our features such as shopping baskets and wish lists

### *Website analytics cookies*

We use these cookies to measure and analyse how our customers use the Website. This allows us to continuously improve the Website and your browsing experience.

### *Customer preference cookies*

When browsing online, the Website will remember preferences you make (for example your user name, language or location). This makes your browsing experience simpler, easier and more personal to you.

### *Targeting cookies or advertising cookies*

These cookies are used to deliver adverts or products relevant to you. In addition, they limit the number of times you see an advertisement as well as helping us measure the effectiveness of our advertising campaigns.

By using the Website you agree that we can place these types of cookies on your device and access them when you visit the Website in the future.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.

Information on deleting or controlling cookies is available at [www.AboutCookies.org](http://www.AboutCookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of the Website.

### **3. How this information may be used, including anyone it might be shared with?**

We will use your personal information to operate the Website and manage your, and other users', use of the Website and the services available through it, including without limitation:

- For research and analytics purposes (for example, to improve the quality of the Website and the services available through it).
- So that we can continually improve the functionality of the Website and the services available through it, by utilising our collective learnings about the way users interact with and use the Website and the services available through it, as well as feedback provided directly to us, to troubleshoot issues, fix bugs, enhance functionality, and identify areas to improve the Website and the services available through it.
- To provide you and other users with the Website and the services available through it, including administration and management of your account.
- To allow you to upload, store and access Customer Data (as defined in our Terms and Conditions).
- To provide you and other users with user support.
- To moderate your account.
- To ensure security for you, our staff and other users of the Website and the services available through it.
- To comply with applicable laws, court orders, government and law enforcement agencies' requests.
- To send you further information about our services for which we think you may have an interest. This information will be supplied only where you have given consent or where we have a legitimate interest to do so.
- To send you further information about our services based on a request we have received from you.
- To provide you with tailored communications that are based on your interactions with the Website and the services available through it.
- To publish industry statistics and market trends.

- To report on benchmarking to third parties.
- To fulfil the obligations we have in relation to any contracts we have in place with you and your employer.
- To provide you with notification about any changes to the Website and the services available through it.
- To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.
- To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy.
- To use data analytics to improve the Website, products/services, marketing, customer relationships and experiences, to define types of customers for our products and services, to keep the Website updated and relevant, to develop our business and to inform our marketing strategy).

Personal information may be shared with other trading divisions within Atelier Technology Limited. Where there is a legal obligation to do so, we may disclose your information to any relevant regulatory or law enforcement body.

We will also share your personal information with Informa Markets Asia Limited who operate our online events platform. They may send you updates on upcoming events but only ever in accordance with your preferences (as detailed in the next section).

We may also use your personal information to send you marketing updates but only ever in accordance with your preferences (as detailed in the next section). We do not sell your details to third party marketing companies.

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

We use an external authentication provider to enable authentication of visitors to the Website when logging-in to use the services, and we share your personal information with that third-party provider for such purposes.

We may share your personal data with 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 Policy.

Finally, we may use your personal information for our internal marketing and demographic studies, together with non-personal data to monitor customer patterns so we can consistently improve the Website design to better meet our visitors' needs.

From time to time we may employ third party business partners to collect personal information on our behalf. We may also share your data with third party business partners to provide you with targeted advertising. In such cases, these third parties will be subject to confidentiality agreements and instructed by us to comply with applicable data protection law.

#### **4. Marketing Opt-in and opt-out provision**

When you register, you will be given the option to opt-out of subscribing to our regular update service which will send you:

(i) Email alerts for new products, features, enhancements, special offers, upgrade opportunities, contests, events of interest, and one-off marketing promotions.

(ii) Direct mail alerts for new products, features, enhancements, special offers, upgrade opportunities, events of interest, and one-off marketing promotions.

Marketing communications you subscribe to will only be sent by Atelier Technology Limited.

At all times, we will offer you the opportunity to unsubscribe out of any service or update to which you have subscribed, if you change your mind. Any e-mail we send you will contain an easy automated unsubscribe link so that you can opt-out of that particular mailshot. Simply follow the indications in the e-mail.

## **5. How you can access and if necessary, change the personal information we maintain**

If for any reason you are concerned that the personal information held by us is not correct, please visit the Website 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 support department, may access your personal data from the website using your password and User ID. Information may be changed online within My Account.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us

In some circumstances you can ask us to delete your data: see paragraph 8 below for further information.

In some circumstances we will 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.

We share your personal data within the Informa Markets Asia Limited. This will involve transferring your data outside the European Economic Area (**EEA**).

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#); or

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

## **6. Safeguarding your personally identifiable information**

We will take reasonable care to maintain appropriate safeguards to ensure the security, integrity and privacy of the information you have provided us with. When you enter your account, we use a Secure Socket Layer (SSL) encryption which encrypts your information before it is sent to us to protect it from unauthorised use. In addition, we will take reasonable steps to ensure that third party business partners to whom we transfer any data will provide sufficient protection of that personal information.

## **7. Where and how to ask questions or file complaints**

If you require further information about our Privacy Policy, please email [administration@atelier.technology](mailto:administration@atelier.technology). If you wish to make a formal communication please write to: c/o Data Privacy Manager, Atelier Technology Ltd, 21 Tollgate, Chandlers Ford, Eastleigh, Hampshire, SO53 3TG United Kingdom.

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.

## **8. Your rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, which are set out below:

- 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.

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 could refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it could 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.