

PRIVACY POLICY

This is the privacy policy of Incognito Group Ltd a company incorporated in England & Wales under number 12409883 whose registered office is at 85 Great Portland Street, First Floor, London, England, W1W 7LT. We respect your privacy and are committed to protecting your personal data.

This policy was updated on 18 June 2020. Historic versions can be obtained by contacting us.

1) Information we may collect from you

We may collect and process the following data from you:

Information that you provide by:

- i) filling in forms on our site www.incognito-group.com (our site) including information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services;
- ii) correspondence with us by phone, email or otherwise;
- iii) our social media platforms

Such information may include, but not be limited to; name, address, phone number, and email address. We may also ask you for information when you report a problem with our site;

If you contact us, we may keep a record of that correspondence and your contact details. We may use these contact details in order to contact you in the future;

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;

Details of your visits to our site including, but not limited to, 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;

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.

2) Information we receive from other sources:

We may receive information about you if you use any other websites we operate or other services we provide. We also work closely with third parties (including for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

3) 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 it is required to complete a contract

We may use and process your personal information where we need to perform the contract we are about to enter into or have entered into with you, or where we have arranged for the supply of another company's products or services to you.

4) Legitimate Interests

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those legitimate interests, for the following purposes;

- i) For marketing activities, other than where you have provided your express consent to be contacted by us by: post, email, text or by phone;
- ii) For analysis to inform our marketing strategy;
- iii) To enhance your customer experience;
- iv) To comply with a request from you in connection with the exercise of your rights (for example where you have asked not to be contacted by us for marketing purposes, we will keep a record of this on our database to comply with your request);
- v) To assess and improve our service to customers through recordings of any calls with us;
- vi) For the management of queries, complaints, or claims.
- vii) Where there is a legal requirement

We will use and process your personal information where we need to comply with a legal, statutory or regulatory obligation (including to verify the accuracy of the information that we hold about you).

5) Where we have your consent

We may use and process your personal information where we have your express consent to use your personal data for a specific purpose confirmed in that express consent.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to you receiving third party direct marketing communications to you via e-mail or text message as explained further below. You have the right to withdraw consent to marketing at any time by contacting us.

6) Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising which could include any of the following depending on the nature of the relationship we have with you:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive these sorts of marketing communications from us;

- i) if you have consented to receiving such information from us either in direct response to a question as to whether you wish to receive such information (including by providing your contact details in response to an enquiry from us as to whether you wish to be included in such communications);

or

- ii) where we have a legitimate interest as detailed above.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Incognito Group Ltd for marketing purposes.

7) Opting out

You can ask us or third parties to stop sending you marketing messages at any time by:

- i) by following the opt-out links or other instructions on any marketing message sent to you;
- or

ii) by contacting us at any time by e-mail to hello@incognito-group.com. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any sort of transaction that we have undertaken with you and which we are entitled by law to keep for durations determined by statute and the common law.

8) Where we store your personal data

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

9) 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 strictly to those employees, agents, contractors and other third parties who have a need to know that data in order to further the transaction in which we are both concerned. 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 (usually the ICO) of a breach where we are legally required to do so and in a format and within timescales stipulated by the applicable regulator or the applicable data protection legislation.

10) Data retention

For how long will we retain your personal data?

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

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. For example; by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being customers for tax purposes and in order to defend ourselves against any contractual claims arising from the transaction in question or the end of the contractor other relationship .In some circumstances you can ask us to delete your data: see below for further information.

That will not necessarily oblige us to delete all of it because, as above, we might need to retain some aspects of it to meet legal, accounting or reporting obligations to which we are subject. 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 are allowed to use this information indefinitely without further notice to you.

11) Cookies

Cookies are small text files that are placed on to your computer's hard drive by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

The cookies used by our website and their purpose are identified and described in our Cookie Policy. We will seek your consent to use cookies. Denial of the cookies used by this website may prevent parts of the website from working properly.

Most web browsers allow some user control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer 8:

- i) Open "Windows Explorer"
- ii) Click on "Tools" menu
- iii) Click "Delete Browsing History"
- iv) Tick "Cookies" and click "Delete"

If you are not using Microsoft Windows Explorer, then you should search for "cookies" in the "Help" function for information on where to find your cookie folder and the controls to manage them.

12) Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

Request access to your personal data (commonly known as a "data subject access request" or "DSAR"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;

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;

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where you believe we have no legitimate reason for 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 obliged to comply fully with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

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. In some cases, we might demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

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:

- i) If you want us to establish the data's accuracy;
- ii) where our use of the data is unlawful but you do not want us to erase it;
- iv) 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;
- iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

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. Again, it is subject to any overriding legal, accounting and reporting rights we might have to retain copies of your data; and

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.

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.

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.

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.

13) Changes to our privacy policy

We reserve the right to change our privacy policy from time to time and any changes we may make will be dated, posted on this page and will be effective immediately upon posting.

14) Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to either:

- i) hello@incognito-group.com
- ii) 85 Great Portland Street, First Floor, London, W1W 7LT, +44 (0) 20 8144 9446