

SOFI Privacy Policy

Policy version: 5th May 2023

SOFI Online and SOFI Events (**SOFI**) are operated by Mallowstreet Limited (**'we', 'our' or 'us'**). We are the controller of personal data obtained via SOFI, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of SOFI. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**). We are also subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals in the European Economic Area (**EEA**).

Given the nature of SOFI, we do not collect sensitive personal data, which includes information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs and sexual life, without your agreement. If you are aware that any sensitive personal data or data of anyone under 17 years old has been shared with SOFI please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the UK
- Cookies
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy

- How to contact us

What this policy applies to

This privacy policy relates to your use of SOFI.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through SOFI. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number and company details
- any delivery addresses specified for your order
- information to check and verify your identity
- your gender, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card or other payment method information,
- details of any information, feedback or other matters you give to us by phone, email, post or via social media
- your account details, such as username and login details
- your activities on, and use of, SOFI
- your or professional interests
- your professional online presence, eg LinkedIn profile
- information about the services we provide to you
- your contact history, purchase history and saved items
- information about how you use SOFI and technology systems
- your responses to surveys, and promotions

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register with us, contact us (including via email), send us feedback, purchase products or services, post material to SOFI and complete customer surveys or participate in competitions via SOFI, and
- indirectly, such as your browsing activity while on SOFI; we will usually collect information indirectly using the technologies explain in the section on ‘**Cookies**’ below.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Create and manage your account with us	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price OR To perform our contract with you or to take steps at your request before entering into a contract
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	To comply with our legal and regulatory obligations OR For our legitimate interests, i.e. to minimise

What we use your personal data for	Our reasons
	fraud that could be damaging for you and/or us
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to protect our business, interests and rights
Customise SOFI and its content to your particular preferences based on a record of your selected preferences or on your use of SOFI	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —your consent as gathered <i>by the separate cookies tool on SOFI</i>—see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price <p>If you have provided such a consent you may withdraw it at any time <i>by changing the setting on the cookies tool</i> (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
Retaining and evaluating information on your recent visits to SOFI and how you move around different sections of SOFI for analytics purposes to understand how people use SOFI so that we can make it more intuitive or to check SOFI is working as intended	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —your consent as gathered by the separate cookies tool on SOFI—see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price <p>If you have provided such a consent you may withdraw it at any time by getting in touch with us using the Contact Details below.(this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>

What we use your personal data for	Our reasons
<p>Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
<p>Protecting the security of systems and data used to provide the services</p>	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
<p>Statistical analysis to help us understand our customer base</p>	<p>For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price</p>
<p>Updating and enhancing customer records</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —where neither of the above apply, for our legitimate interests, e.g. making sure that we can keep in touch with our customers about existing orders and new products
<p>Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, eg to record and demonstrate evidence of your consents where relevant.</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Marketing our services to existing and former</p>	<p>For our legitimate interests, i.e. to promote our</p>

What we use your personal data for	Our reasons
customers	business to existing and former customers See ' Marketing ' below for further information
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets

How and why we use your personal data—sharing

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates (by email or telephone or) about our services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at privacy@mallowstreet.com

We may ask you to confirm or update your marketing preferences if you ask us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations outside the Mallowstreet group for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see **'Your rights'** below.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you,
- other third parties we use to help us run our business, e.g. website hosts and website analytics providers

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

How long your personal data will be kept

We will retain personal data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. To provide security and business continuity for the activities described in this Privacy Policy, we make backups of certain data, which we may retain for longer than the original personal data.

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use SOFI. Our cookies help provide additional functionality to SOFI and helps us analyse SOFI usage more accurately. You can change your settings to notify you when a cooking is being set or updated or to block cookies altogether. Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by SOFI</p>
The right to withdraw consents	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time

	Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn
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For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below ‘**How to contact us**’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

The UK’s Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time and you should regularly check for updates.

How to contact us

Individuals in the UK

You can contact us and/or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our Data Protection Officer's contact details
First Floor, 4-6 Throgmorton Ave, London EC2N 2DL
Dataprotectionofficers@mallowstreet.com
Tel: 02039722560