

---

## PRIVACY NOTICE

---

### BACKGROUND:

Jack Nadel International and its wholly owned subsidiary Confablo Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it.

### 1. Definitions and Interpretation

In this Notice the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

### 2. Information About Us

Our Site is owned and operated by Jack Nadel International Ltd, a limited company registered in England under company number 03999489.

Registered address: Monmouth House, 87-93 Westbourne Grove, London, W2 4UL.

Representative: Simon Patnick.

Email address: [simon.patnick@nadel.uk.com](mailto:simon.patnick@nadel.uk.com).

Telephone number: 0207 535 3400.

### 3. What Does This Notice Cover?

This Privacy Notice applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that We hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information: name	User self signup or single sign on (SSO) login
Contact information email address; telephone number, address	User self signup or single sign on (SSO) login
Business information: business name	User self signup or single sign on (SSO) login
Order Recipient Information: name, email address, telephone number delivery address	User order entry
Technical information: IP address, browser	Error log

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site	Name, email address and business address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.
Providing and managing your Account.	Name, email address and business address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.
Providing and managing your access to Our Site.	Name, email address and business address.	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.
Administering our business.	Name, email address and business address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services

		requested by users of the webstore.
Supplying our products services to you.	Name, email address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.
Communicating with you.	Name, email address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.
Supplying you with marketing information by email (you may opt-out at any time by clicking the unsubscribe link attached to every email).	Name, email address and	Legitimate Interests – in order to provide further information about similar products or services.
Supplying you with information about your order	Name, email address and	Legitimate Interests – in order to provide the webstore, process the orders and provide the services and information requested by users of the webstore.
Supplying reporting information to your Company	Name, email address	Legitimate Interests – in order to provide the webstore, process the orders and provide the services requested by users of the webstore.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or

incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information: name	Data is retained for the duration of the contract with the company to whom products and services are provided and for the time specified in the contract after termination.
Contact information: email address, telephone number, business address	Data is retained for the duration of the contract with the company to whom products and services are provided and for the time specified in the contract after termination.
Business information: business name	Data is retained for the duration of the contract with the company to whom products and services are provided and for the time specified in the contract after termination.
Technical information IP address	Data is retained for the duration of the contract with the company to whom products and services are provided and for the time specified in the contract after termination

## 9. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We share your data with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#); or

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under

the Data Protection Legislation. More information is available from the [European Commission](#).

Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

#### 10. **Do You Share My Personal Data?**

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same ways that we have used it, as specified in this Privacy Notice.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group in order to provide products and services to you. This includes our subsidiaries and our corporate shareholder.

We may sometimes contract with the following third parties to supply products services.

<b>Recipient</b>	<b>Activity Carried Out</b>	<b>Location</b>
Product suppliers	Manufacture and supply merchandise products	UK; USA;
Distribution Centres	Warehousing and Distribution	Dependent upon Client requirements
Payment Providers	Receiving payments from users (no personal data collected through Our Site)	USA
Mailgun	Sending transactional store emails	USA
API providers	Website functionality	USA; EU

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in

accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same ways that we have used it, as specified in this Privacy Notice.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

## 13. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 10 working days, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases,

however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**14. How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site in order to provide our products and essential services to you. All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Store URL	Session management, essential store functionality	Yes

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
Google	Google	Recaptcha fraud / abuse protection on forms – essential for store function
Stripe	Stripe	Credit card payment provider – essential for store function

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [info@nadel.uk.com](mailto:info@nadel.uk.com)

Telephone number: 0207 535 3400.

Postal Address: Monmouth House, 87-93 Westbourne Grove, London W24UL.

16. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Notice was last updated in September 2020.