

KATHRYN SARGENT

BESPOKE TAILORING

N°6 Brook Street, 1st Floor, Mayfair, London, W1S 1BB
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Kathryn Sargent

Privacy Policy

Our privacy promise

Welcome to our privacy policy.

Here at Kathryn Sargent we are committed to protecting and respecting your privacy. This privacy policy explains how we collect, use and store personal information about you, tells you about your privacy rights and how the law protects you.

If you have any questions about this privacy policy, or the ways in which we handle your personal information, please contact us using the details set out below in the **“Who we are and how to contact us”** section.

Changes to our privacy policy

Our privacy policy was last updated on 7 June 2018. We may update our privacy policy at any time, for example to make sure that we continue to collect, use and store your personal information fairly, securely and in accordance with data protection law in the UK. If we decide to materially change this privacy policy, the changes will be posted on our website so that you are always informed of the latest version. We suggest that you regularly revisit this update section to make sure that you keep up-to-date with any changes we make.

What is personal data?

Personal data, or personal information, means any information about you from which you can be identified.

When does our privacy policy apply?

Our privacy policy applies to prospective clients and existing clients (and, if applicable, their representatives and family members), and our business contacts when:

- you visit our website using any device, including your mobile phone;
- you contact us by post, telephone or email;
- you attend a fitting with us, either before or after placing an order with us for our products or services; and
- when you place an order with us for our products or services, for example, when you commission us to make a garment for you, or when you ask us to alter or repair a garment we have made for you.

Other people’s details: Sometimes you may be given the opportunity to submit personal information about other people. For example you may give us the contact details of a member of staff who you wish us to use as your contact point, or you may provide personal information about your family as part of the profile data we collect about you (for more information please see **“The personal data we collect about you”** section below). You must



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obtain permission from other people before you give their information to us, and provide them with a copy of this privacy policy or direct them to the privacy policy displayed on our website.

What does our privacy policy tell you?

Our privacy policy:

- explains how we collect, use and store personal data about you; and
- tells you about your privacy rights and how the law protects you.

1. Who we are and how to contact us

References in this privacy policy to "we", "us" or "our" means Kathryn Sargent Ltd, a company registered in England and Wales under company number 7911182.

We operate the website kathrynsargent.com.

We are the "data controller", which means that we are responsible for deciding how we hold and use personal data about you.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below:

- **Write to us at:** Compliance Officer, Kathryn Sargent Ltd, No.6, Brook Street, 1st Floor, Mayfair, London W1S 1BB
- **Email us at:** compliance@kathrynsargent.com
- **Call us on:** 020 7493 2450.

If you are contacting us to exercise your legal rights relating to your personal data, please let us know what personal data you are contacting us about and what you want us to do, or stop doing, with that data.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. The personal data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, last name, title, date of birth, gender and your measurements if you attend a fitting with us (either before or after placing an order with us for our products or services) and your photograph;
- **Contact Data** includes postal addresses, billing addresses, email addresses and telephone numbers (including mobile phone numbers);



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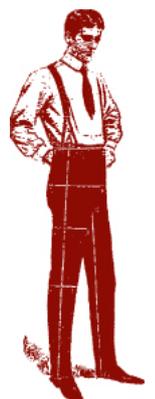
- **Financial Data** includes bank account and payment card details;
- **Transaction Data** includes details about payments and other details of products and services purchased from us;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. **Profile Data** includes your reasons for placing an order with us (e.g. a special occasion, such as a birthday or wedding), details about your profession, family and lifestyle (to the extent relevant to enable us to supply appropriate products and services to you), your preferences about fabrics, colours, tailoring and fit, and any other personal preferences or requirements relevant to the products or services we are providing to you. We also collect information about the history of our interactions and communications with you, such as garments we have made for you and any services we have provided to you, your personal interests, feedback, and any survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

3. How your personal data is collected

We use different methods to collect personal data from and about you including through:

- **Information you give us:** Personal data may be given by you directly when you:
 - fill out a contact form on our website;
 - when you attend a consultation or a fitting with us, either before or after placing an order with us for our products or services;
 - when you place an order with us for our products or services, for example, when you commission us to make a garment for you, or when you ask us to alter or repair a garment we have made for you;
 - sign up to receive emails or other marketing communications from us;
 - contact us by post, telephone, email or social media; or
 - when you attend any events we host.
- **Information we collect about you**
- When you visit our website we may automatically collect Technical Data about you (please see "**The personal data we collect about you**" section above for more information). We may collect this personal data by using "cookies".

What are cookies? Cookies are small text files that are placed on your computer or mobile phone (your "device") by websites that you visit. They are widely used in order to make websites work, or work more efficiently,



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How are cookies used?: We only use cookies on our website in order to improve our website, to make certain features on our website work, or work more efficiently,

The cookies we use on the website will not collect personally identifiable information about you and we will not disclose information stored in cookies that we place on your device to third parties.

Consent to use cookies: By continuing to browse the site, you are agreeing to our use of cookies.

What can I do if I do not want you to use cookies? If you do not want us to use cookies when you use our website, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on our website may not function as a result.

How do I change my cookie settings?: Most web browsers allow some control of most cookies through the browser settings.

You can use the link below to find out more about cookies, including how to see what cookies have been set, and how you can delete cookies which are already stored on your device.

visit www.aboutcookies.org or www.allaboutcookies.org.

You can also use the following links to find out how to manage cookies on these popular browsers:

GoogleChrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

MicrosoftEdge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

MozillaFirefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

MicrosoftInternetExplorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

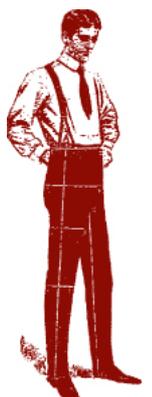
AppleSafari: https://support.apple.com/kb/ph21411?locale=en_US

- **Information received from third parties or publicly available sources:** We may also receive personal data about you from publicly available sources such as the electoral register and from third parties such as analytics providers, e.g. Google.

4. When we will use your personal data

We will only use your personal information when the law allows us to: We need to have a “lawful basis” to use your personal data. The types of “lawful basis” that we will rely on to process your personal data are as follows:

- **To perform a contract:** Where it is necessary to perform a contract we are about to enter into or have entered into with you to provide you with products or services that you request from us, for example, to make a garment for you or to alter or repair a garment we have made for you.



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- **To comply with a legal obligation:** Where we need to comply with a legal or regulatory obligation, for example, a court order in a legal action.
- **Where we have your consent:** We will require your prior consent, for example, to use your personal data to send you electronic direct marketing (such as emails or texts).
- **It is in our legitimate interests:** We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we use your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

By “Legitimate Interests” we mean our interests in conducting and managing our business to enable us to give you the best products and services and the best and most secure experience, for example to:

- personalise your customer experience, such as tailoring the communications that we send you with your preferred products and services;
- improve our customer service, such as recording and/or monitoring calls for the purpose of improving our customer service, ensure quality assurance, training and security;
- optimise our website to ensure that content from our site is presented in the most effective manner for you and for your computer;
- prevent fraud, for example, such as using your information to protect you against fraud and to ensure that our systems are safe and secure;
- conduct research, such as using your information to carry out aggregated and anonymised research using site analytics, or if you choose to take part in a customer survey, to study how customers use our products and services to help us develop and improve our products and services and inform our marketing strategy; and
- to send you marketing communications, for example, to keep you up-to-date with the latest news, events, brochures, products and services we think may be of interest and relevant to you. We may need your consent to send you marketing communications in certain circumstances, please see the “**Direct Marketing – your choices**” section below for more information)

We may also combine information we receive about you with information you give to us and information we collect about you. We will only use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We may use automated processing to analyse combined information about you, which is software and other technology that analyses data and automatically makes decisions based



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on that analysis, for example, to decide which products and offers would be relevant for us to contact you about.

You can obtain further information about how we assess our legitimate interests against the potential impact on you by contacting us using the details above in the “**Who we are and how to contact us**” section.

We may have more than one lawful basis to use your personal data depending on the specific purpose for which we are going to use that personal data. Please contact us using the details above in the “**Who we are and how to contact us**” section if you need details about the specific ground we are relying on to process your personal data.

We will only use your personal data for the purposes for which we collected it: We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is related to the original purpose. If we need to use your personal data for an unrelated purpose, we will let you know and will explain the legal basis which allows us to do so.

Direct Marketing – your choices:

How to Opt-in: You will only receive electronic marketing communications from us (such as emails and texts) if you have:

- requested information from us, for example, by signing-up to our newsletter; or
- specifically opted-in to receive details about our products, services, events, activities, promotions and special offers which we feel may be of interest to you when we have given you the choice to do so, for example, when you place an order for our products or services.

If you wish to be contacted for these purposes please make sure that you tick the appropriate box or boxes when you are given the option to do so, otherwise we will assume that you do not want to be contacted.

We will not pass your information onto third parties for marketing purposes.

How to Opt-out: Your participation in our marketing activities is voluntary. If you ever want to change your preferences regarding our use of your personal information for marketing purposes, or opt-out altogether from receiving further marketing information, you can:

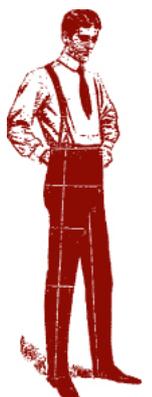
- use the opt-out or unsubscribe links in any marketing message we send you; or
- contact us at any time by email or phone using the contact details above in the “**Who we are and how to contact us**” section.

Where you opt-out of receiving marketing communications from us, we may continue to use your personal data for the other purposes we have explained above in the **How we use your personal data** section of this policy.

5. Who we share your personal data with

We will only share your personal information with the following third parties or in the following circumstances:

- **To our service providers and suppliers:** So that we can make certain services and products available to you we may need to share your personal data with some of our



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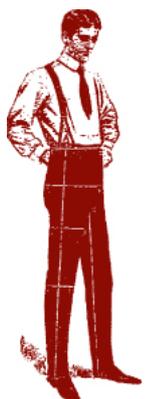
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service providers and suppliers, such as couriers and card processing providers, as well as IT providers, site analytics providers and marketing service companies to, for example:

- process your card payments;
 - deliver products to you;
 - host our website;
 - store our customer database;
 - operate certain of the features of our website;
 - send marketing communications and conduct customer research on our behalf;
 - manage and analyse our network status and the responsiveness of our services.
- **To other third parties:** we may also share your personal data with the following third parties or in the following circumstances:
 - **On a business purchase, sale, transfer or merger:** we may disclose your personal data to 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, in which case we may disclose your personal data to such other businesses. If a change happens to our business, then the new owners may only use your personal data in the same way as set out in this privacy notice.
 - **To our professional advisers including lawyers, bankers, auditors insurers and accountants** who provide consultancy, banking, legal, insurance and accounting services.
 - **To HM Revenue & Customs, regulators and other authorities** who require reporting of processing activities in certain circumstances.
 - **To comply with or enforce applicable laws or regulations:** We may disclose personal data about you to third parties to comply with or enforce applicable laws and regulations. For example where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.

Safeguarding your personal data when we share it with other people: We require our suppliers, service providers and other third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our suppliers and service providers to use your personal data for their own purposes or pass your personal data to anyone else without our written consent. We only permit our suppliers and service providers to use your personal data to provide services to us and you, and for no other purpose, and in accordance with our written instructions.



Third party links, advertisers, sponsors and ad-servers: Our website may contain links to other sites that are not covered by this privacy policy and where privacy practices may be different from ours. We do not own or operate these sites. You should consult the privacy policies on such third party sites before submitting any personal information, as we are not responsible for, and have no control over, the manner in which such sites collect, use, disclose, or otherwise process your personal data.

6. Transfers of your personal data outside the UK

We are based within the European Economic Area (EEA). However, in certain circumstances information we collect about you will be sent to and held by us in countries outside the EEA where we work with suppliers and service providers that are based outside the EEA or have servers based outside the EEA. Countries outside the EEA protect information differently, and so where we do transfer your information to suppliers based outside the EEA, we will take all steps necessary to ensure that it is adequately protected and used in accordance with this privacy notice, including but not limited to relying on any appropriate cross-border transfer solutions such as the European Commission's standard contractual clauses (http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index_en.htm) or the [EU-US Privacy Shield Framework \(https://www.privacyshield.gov/welcome\)](https://www.privacyshield.gov/welcome).

7. How we keep your personal data secure

Our security measures:

Unfortunately, the transmission of information via the Internet is not completely secure, however, please be assured that 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. For example we:

- ensure the physical security of our office;
- ensure the physical and digital security of our equipment, devices and systems by way of password protection, encryption and access restrictions;
- limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

8. How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting obligations and requirements.

By law we have to keep certain basic information about our customers (including Contact, Identity and Financial Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see the "**Your legal rights**" section below for further information.

Please note that if we have been informed by you that you no longer wish to be contacted by us, we will need to keep your relevant Identity Data and Contact Data about you indefinitely to ensure that we comply with your wishes (please see "**The personal data we collect about you**" section above for more information).

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 may use this information indefinitely without further notice to you.



9. Your legal rights

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

You have the right to:

Request access to your personal data (known as a "data subject access request"): 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, although 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 there is no good reason for us continuing to use 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 us using it (see below), where we may have used your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply 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 use of your personal data: You can object 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 us using your personal data on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to use your information which override your rights and freedoms. Please see the "**When we will use your personal data**" section above.

Request that we stop using your personal data for marketing purposes: please see the "**Direct Marketing – your choices**" section above.

Request restriction of processing of your personal data: This enables you to ask us to suspend the use of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

Withdraw consent: You can withdraw your consent at any time where we are relying on consent to use your personal data. However, this will not affect the lawfulness of any use carried out before you withdraw your consent.

How to exercise your rights: If you wish to exercise any of the rights set out above, please contact us by using the details above in the "**Who we are and how to contact us**" section, or by checking if the applicable boxes on forms that we use to collect your information, or to tell us that you don't want to participate in marketing. If you wish to remove your information from our marketing circulation lists, which include receiving marketing emails, you can unsubscribe by scrolling to the bottom of the email and clicking the "unsubscribe" link.



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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.

