Frasers Plus Loyalty Scheme

Privacy Policy

We view the security of our customers data as paramount. Any personal data about you and from which you can be identified is stored securely and confidentially and is processed in accordance with applicable legislation (including the UK General Data Protection Regulation, the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003) and this Fraser Plus Loyalty Scheme Privacy Policy, which sets out what personal data we process when you interact with us and how we use your personal data in respect of the Frasers Plus Loyalty Scheme ("**Loyalty Scheme**").

We may change this Loyalty Scheme Privacy Policy from time to time – when we do, where appropriate, we will inform you via email.

Who we are

The Loyalty Scheme is operated by Frasers Group Loyalty Services Limited ("FGLS", "we", "us", "our"), whose registered address is Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB. Our company number is 013340837.

Frasers Group Loyalty Services Limited is the data controller in respect of personal data collected in connection with the Loyalty Scheme. Our ICO registration number is ZC081267. If you have any queries regarding our use of personal data or this Loyalty Scheme Privacy Policy, you can email data.protection@frasers.group or write to Data Protection, Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB.

The Loyalty Scheme forms part of the Frasers Plus Credit product and related products and services (such as the Frasers Plus app) ("**Frasers Plus**"). Please see the separate Frasers Plus Privacy Policy PPwhich sets out how your personal data is used in respect of Frasers Plus.

Frasers Group Financial Services Limited whose registered address is Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB ("**FGFS**") which operates Frasers Plus acts as our data processor in respect of personal data collected in connection with providing, running and administering the Loyalty Scheme.

Data we may hold about you

In order to provide you with the Loyalty Scheme, we will collect personal data such as:

- identification information such as your first name, last name, title, username (or similar identifier);
- contact details such as your email address;

- where it is reasonably necessary, we may process special categories of personal data that are particularly sensitive, such as information about your health, to deliver our services to you in the most appropriate way;
- profile data such as your password, purchase information, spending patterns, your interests and preferences, your feedback and survey responses and social media data (for example handles);
- technical data such as your IP address, login data, time zone information, browser type and version, operating system and platform and technology and devices used for accessing Frasers Plus;
- usage data about how you use our products and services;
- call data such as call logs and recordings; and
- marketing and communications data.

We may also collect and process aggregated data, such as statistical or demographic data. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific app feature. We may use this data for the same purposes as set out below.

In some cases, the personal data we process is provided to us directly by you, for example, the personal data in your application for Frasers Plus, in the context of accessing the Loyalty Scheme or when corresponding with us. We may also collect data from you indirectly, for example the technical data listed above as you interact with the Frasers Plus website and app. In other cases, we also receive personal data about you from other sources.

How we may use your personal data

We may use your personal data in the following ways:

- to register you for the Loyalty Scheme, including to set you up with, maintain and update your Loyalty Scheme account (e.g. such as a change of address or change in your marketing preferences) and to provide, run and administer the Loyalty Scheme;
- to meet our legal, regulatory and compliance requirements (e.g. in relation to financial crime and anti-money laundering);
- to detect and prevent fraudulent transactions and/or any other criminal activity (we may pass your details to a third party to carry out these functions);
- to provide information to, and receive information from, third parties who help us to operate and provide the Loyalty Scheme;
- to answer your questions, and deal with enquiries or complaints;
- to communicate with you about your account;
- to tell you about similar products and services, or products and services that you ask us to send you information about and to keep in touch with you regarding your

marketing preferences, in accordance with 'Marketing and promotional communications' below;
- to undertake customer satisfaction surveys and other similar research;
- to analyse and improve the Loyalty Scheme and any related products or services (e.g. the Frasers Plus app);
- to support the sale, transfer or merger of part or all of our business or assets;
- to manage our business;
- where relevant, for the establishment, exercise or defence of legal claims; and
- to keep our network safe and secure.

Legal basis for using your personal data

We will only use your personal data when applicable legislation allows us to. We rely on the following lawful bases to process your personal data:

- where you have given us consent to use it – you are able to withdraw your consent at any time, by contacting us in accordance with 'How to contact us or complain' below;
- where it is necessary to perform an agreement we have entered into with you, or to take steps at your request prior to entering into an agreement with you;
- where necessary for compliance with our legal obligations; or
- where it is necessary for our legitimate interests (or those of a third party), including in managing and operating our business, where these are not overridden by your rights and interests.

Where we process **special categories** of personal data about you, such as information about your health, we need a further condition for processing as well as one of the lawful bases set out above. We may need to process limited amount of your health data to establish and record if you have specific needs that we should consider, to make sure your interactions with us are appropriate and fair. We will process this data based on **substantial public interest**, specifically to **protect the economic wellbeing of an individual at economic risk** who is aged 18 or over.

How long we keep your personal data

We will not keep your personal data for any purpose(s) for longer than is necessary and we will only retain the relevant personal data that is necessary in relation to the purpose.

We will retain the personal data provided for registering an account for the Loyalty Scheme and collected during your use of the Loyalty Scheme so long as that account remains in existence and for 7 years thereafter.

In the case of any contact you may have with our customer services department, we will retain those details for as long as is necessary to resolve your query and for 7 years after the query is closed.

If we are legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, respond to any questions, complaints or claims made by you or on your behalf, prevent fraud and abuse, keep records required by law or enforce our terms and conditions, we may also retain some of your personal data for a limited period of time, even after you have closed your account.

We will retain your personal data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

How we might share your personal data

We may routinely share your personal data with other companies in the Frasers Group, which means the companies who are ultimately owned or controlled by Frasers Group plc and can include FGFS in relation to interactions between us and FGFS and for services that FGFS may provide to us.

We may also share your personal data with carefully selected third parties who assist us in providing you with the Loyalty Scheme. This includes the following types of third party:

- Communications and customer relationship management service providers which support our interactions with you (for example in sending you service or marketing communications);
- Analytics and research service providers who assist us in profiling, analysing and interpreting data;
- Retailers who offer the Frasers Plus Loyalty Scheme ("**Frasers Plus Retailers**");
- Our (and the Frasers Group's) technology and payments services providers (including TPL);
- Our (and the Frasers Group's) professional advisers, including, without limitation, our insurers; and
- Our (and the Frasers Group's) suppliers, business partners and sub-contractors.

We will only share your personal data with third parties where it is necessary for them to provide us with the services we need.

In the event that we were to sell our business or assets, we may disclose your personal data to any prospective/actual purchaser and/or their advisers.

We may disclose and exchange information with law enforcement agencies, government authorities and regulatory bodies to comply with our legal and regulatory obligations.

We may also disclose your personal data where we are subject to a legal obligation to do so, in connection with the prevention or detection of crime, for the purpose of establishing, exercising or defending our legal rights, or where we consider that we receive a valid request for disclosure. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by visiting the following website www.cifas.org.uk/fpn.

Please note that third party websites/providers have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you provide or submit any personal data to these websites/providers.

Where your personal data is held

Information may be held at our offices and in our IT systems and those of the Frasers Group as well as by its and our professional advisers, service providers, suppliers, business partners and sub-contractors.

Some of these third parties may be based outside the UK or European Economic Area ("**EEA**"). For more information, including on how we safeguard your personal information when this occurs, see below: 'International transfers of your personal data'.

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 business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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.

Marketing and promotional communications

We and members of the Frasers Group and Frasers Plus Retailers may use your personal data to send you updates (depending on your stated preferences, by email, post, mobile, telephone and/or through other digital means including social media platforms) about each of our products and services, including exclusive offers, promotions or new products and services.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside the Frasers Group or Frasers Plus Retailers for their marketing purposes.

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

1. Through the Frasers Plus app:
    - Log into the app
    - Tap the person icon at the bottom right of the screen
    - Tap on Settings
    - Slide On/Off to change marketing consent
2. By contacting Frasers Plus customer services by web chat or email via the Frasers Plus app.
3. By writing to us at the address set out in 'How to contact us or complain' below.

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

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

International transfers of your personal data

The personal data that we process may be transferred to, and stored outside, the UK or EEA. It may also be processed by staff operating outside the UK or EEA who work for us or for one of our suppliers or third party providers. Where we do so, the third country's data protection laws will have been approved as adequate by the UK government/relevant UK authority or European Commission (as applicable), or other applicable safeguards are in place. If you wish to receive a copy of these safeguards, please contact us in accordance with 'How to contact us or complain' below.

Your rights

You have certain rights in relation to personal data we hold about you. Details of these rights are set out below. You can exercise these rights by contacting us in accordance with 'How to contact us or complain' below.

Right to Object to or Restrict Processing	In some circumstances, you have the right to object to our processing of your personal data – e.g. if we are processing your data on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal data for direct marketing purposes (for more information, see 'Marketing and promotional communications' above). If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved.
Right to Withdraw Consent	Where you have consented to us using your personal data, you can withdraw that consent at any time.

Right of Erasure	In some circumstances you can ask us to erase your personal data – e.g. if you withdraw your consent, it is no longer necessary for us to use your personal data, you object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.
Right of Access	You have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.
Right of Correction or Completion	If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.
Right of Data Portability	You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
Right not to be Subject to Automated Decision-making	You have the right not to be subject to an automated decision made by us which produces legal or other significant effects on you. For more information, see 'Automated decision-making' above.

To exercise these rights, we need to be suitably satisfied of your identity and so may request you provide identification documents or confirm other details we may hold about you (such as a recent delivery reference or address).

How to contact us or complain

If you have any queries or concerns regarding how we use your personal data, please email data.protection@frasers.group or alternatively write to: Data Protection, Express House, Petre Road, Clayton Business Park, Accrington, Lancashire, BB5 5JB.

If you are not happy with our response, you can contact the Information Commissioners Office: https://ico.org.uk. The ICO's address is Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, and its helpline number is 0303 123 1113.