

1. Who are we?

WeGift is powering gift cards for a new generation of business and enabling a global marketplace of retailers to connect to gift card buyers. We have a number of products to enable gift cards buyers to purchase gift cards, and for retailers to sell their gift cards. This website enable you to find out more information around the services WeGift offers, as well request more information on the company.

The **Sub-Processor** in respect to this website is The Voucher Market Ltd t/a WeGift. Our Registered Address is 1st Floor, Buckhurst House, 42-44 Buckhurst Avenue, Sevenoaks, Kent, TN13 1LZ.

We have appointed a GDPR Owner who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us on the contact details below.

2. Collection of your personal Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Information you Give Us:

Identity Data: First Name and Last Name

Contact Data: Billing Address, Delivery Address, Telephone number and Email Address.

Technical Data: Internet Protocol (IP) address.

Usage Data: Information concerning how you use our website, products and services

3. Use of 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 we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you consent to us processing your personal data

Purposes for which, we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To process and deliver your order, including:</p> <p>(a) Track and fulfil your reward</p> <p>(b) managing your queries through our Customer Service team</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	Performance of a contract with you
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p>	Consent obtained
<p>To notify you in relation to our legal obligations and documents, including changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	Necessary to comply with a legal obligation

4. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

You may withdraw consent at any time by completing a Subject Consent Withdrawal Form. This will be provided to you upon, emailing our GDPR Owner.

5. Disclosure of personal data to third parties

WeGift may disclose your information to third parties, where necessary or required. In some instances, your data may be transferred to third parties located outside of the UK. We will ensure that appropriate safeguards are in place to protect your data before this transfer takes place.

Third-Party Service Providers

This includes service providers, who assist us with the running of our website and business activities. These have been detailed below, with the appropriate safeguards in place.

Legal Compliance

We may also share your personal data with third parties, to comply with applicable legislation. Examples of these third parties are, HM Revenue & Customs, the Information Commissioners Office, the police and other public authorities.

6. International Transfers:

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Third Party Service Providers

Service Providers and Location	Purpose	Safeguards in place to protect your personal data
Web Hosting Platform	Our Cloud-hosting provider, is used to host our website.	Active: EU-US Privacy Shield
Email Sending Service	Our Email Sending Service is on occasion used to send out emails to users.	Active: EU-US Privacy Shield

7. Retention period

We will retain your personal data for no longer than is necessary. We will generally retain Personal information that you provide us for as long as we consider it potentially useful in contacting you about our services, as needed for our legal obligations., or in order to complete our contractual obligations.

In some instances, we will delete this information at an earlier date if you so request.

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.

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

8. Protection of Your Personal Data

We are committed to protecting your data and to ensure it remains safe and confidential. We maintains strong technical, and physical security measures, which are designed to protect your information.

We are an ISO 27001 accredited company, and actively pursue standards to ensure the security of your information.

9. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

Your Right	Explanation
Right of access	you have the right to request a copy of the information that we hold about you.
Right of rectification	you have a right to correct data that we hold about you that is inaccurate or incomplete.
Right to be forgotten	in certain circumstances you can ask for the data we hold about you to be erased from our records.
Right to restriction of processing	where certain conditions apply to have a right to restrict the processing.
Right of portability	you have the right to have the data we hold about you transferred to another organisation.
Right to object	you have the right to object to certain types of processing such as direct marketing.
Right to object to automated processing, including profiling	you also have the right to be subject to the legal effects of automated processing or profiling.
Right to judicial review	in the event that WeGift refuses your request under rights of access, we will provide you with a reason as to why.

To exercise any of these rights, please contact us.

10. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by WeGift (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and WeGift's data protection representatives GDPR Owner.

11. Contact

	Supervisory authority contact details	GDPR Owner Contact Details
Contact Name:	ICO	
Address line 1:	Information Commissioner's Office Wycliffe House	
Address line 2:	Water Lane	
Address line 3:		
Address line 4:	Cheshire	
Address line 5:	SK9 5AF	
Email:	registration@ico.org.uk	
Telephone:	0303 123 1113 (local rate)	