

Unicorn Group – Privacy Notice

1 – Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Unicorn Group uses your data; for example we will explain things such as our credit checking procedure, and how we combine data across Unicorn Group to build a picture of you.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

2 - What is Unicorn Group

Unicorn Group is made up of a number of related businesses:

Unicorn Hygienics, Unicorn Urban, Flexi-Tile, EcoLoc Flooring, Grit-bins.co.uk

3- Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.



Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting the Unicorn Group to law enforcement .

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

4- When do we collect your personal data?

When you visit any of our websites, and use your account to buy products and services on the phone, in a shop or online.

When you make an online purchase and check out as a guest (in which case we just collect transactionbased data).

When you create an account with us.

When you purchase a product or service online, by phone but don't have (or don't use) an account.

When you engage with us on social media.

When you contact us by any means with queries, complaints etc.

When you ask one of our partners/distributors to email you information about a product or service.

When you enter prize draws or competitions.

When you choose to complete any surveys we send you.

When you comment on or review our products and services.



Any individual may access personal data related to them, including opinions. So if your comment or review includes information about the Partner who provided that service, it may be passed on to them if requested.

When you fill in any forms. For example, if you do not receive your delivery, a Partner may collect your personal data.

When you've given a third party permission to share with us the information they hold about you.

We collect data from publicly-available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.

When you use our car park, which usually has a CCTV systems operating for the security of both customers and Partners. These systems may record your image during your visit.

5 - What sort of personal data do we collect?

If you have a web account with us: your name, gender, date of birth, billing/delivery address, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.

Details of your interactions with us through phone contact, online.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, gift list and wish list choices, voucher redemptions, brands you show interest in, web pages you visit and how and when you contact us.

Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.

Details of your shopping preferences.

For example, which items you usually purchase when using the Unicorn Hygienics customer portal.

Details of your visits to our websites and which site you came from to ours.

Information gathered by the use of cookies in your web browser.

Personal details which help us to recommend items of interest.

For example, you might tell us the size of the room you are looking to install one of our products, which we may use to guide our suggested items.



We'll only ask for and use your personal data collected for recommending items of interest and to tailor your experience with us. Of course, it's always your choice whether you share such details with us.

Payment card information.

Your comments and product reviews.

Your image may be recorded on CCTV when you visit a shop or car park.

Your car number plate may be recorded at some of our car parks to manage parking restrictions.

To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered. Learn more about this.

Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

6 - How do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

Here's how we'll use your personal data and why:

To process any orders that you make by using our websites or over the phone. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.



To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.

For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.

To protect our customers, premises, assets and Partners from crime, we operate CCTV systems in our car parks which record images for security. We do this on the basis of our legitimate business interests.

To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.

If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim is to protect the individuals we interact with from criminal activities.

With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone and through our sales team about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

To send your relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

To display the most interesting content to you on our websites, we'll use data we hold about your favourite products and so on. We do so on the basis of your consent for our website to place cookies or similar technology on your device.



For example, we might display a list of items you've recently looked at, or offer you recommendations based on your purchase history and any other data you've shared with us.

To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having

To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences here.

To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the Unicorn Group, third parties and data from publicly-available lists as we have described in the section 'What Sort of Personal Data do we collect?' We'll do this on the basis of our legitimate business interest.

For example, by combining this data, this will help us personalise your experience and decide which inspiration or content to share with you. We also use anonymised data from customer purchase histories to identify trends in different areas of the country.

7 - Combining your dataa for personalised dirtect marketing

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across the Group as described above, for example your shopping history with Unicorn Hygienics. For this purpose we also combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us – such as the Land Registry mentioned above.

8 - How we protect your personal data



We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured and tokenised to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

9 - How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

Orders

When you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations. In the case of certain products, such as flooring items, we'll keep the data for 10 years.

Warranties

If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

10. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, installers visiting your home or business, for fraud management, to handle complaints, to help us personalise our offers and to distributors when you are inquiruibing/purchasing a product etc.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

We provide only the information they need to perform their specific services.



They may only use your data for the exact purposes we specify in our contract with them.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

IT companies who support our website and other business systems.

Operational companies such as delivery couriers.

Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.

Data insight companies to ensure your details are up to date and accurate.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

Iwe run a joint event with a restaurant, and you agree to receive direct communications from them.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may, from time to time, expand, reduce or sell the Unicorn Group may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact us on - +44 (0) 28 9262 5898 or email - info@unicorn-group.com

11 - Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA.



International orders

If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to Unicorn Group

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

12 - What are your rights over your personal data?

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

The deletion of the data we hold about you, in specific circumstances; for example, when you withdraw consent or object, and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).

A computer file in a common format (CSV or similar) containing the personal data that you have previously provided to us, and the right to have your information transferred to another entity where this is technically possible.

Restriction of the use of your personal data, in specific circumstances, generally while we are deciding on an objection you have made.

That we stop processing your personal data, in specific circumstances; for example, when you have withdrawn consent, or object for reasons related to your individual circumstances.

That we stop using your personal data for direct marketing (either through specific channels, or all channels).

That we stop any consent-based processing of your personal data after you withdraw that consent.

Review by the Unicorn Group based solely on automatic processing of your data (so where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time by completing an online form.

If we choose not to action your request, we will explain the reasons for our refusal.



Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data, such as administration of an extended warranty.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

13. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.

If you have an account, log in into your Unicorn Hygienics account , visit the 'My Account' area and change your preferences.

Write to us at -

Unicorn Group,

Riverbank, The Green,

Tullynacross Road,

Lisburn, BT27 5SR

T : +44 (0) 28 9262 5898



E : info@unicorn-group.com

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

15. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

16. If you live outside the UK

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

Australia



For the purposes of this Privacy Notice, 'personal data' means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not the information or opinion is recorded in a material form.

If you are in Australia you may submit any questions, comments or complaints to us and we will come back to you within 30 days.

If you are contacting us to complain about an alleged breach of this Privacy Notice or our legal privacy obligations, please provide us with as much detail as possible in relation to your complaint.

We will take every privacy complaint seriously and assess it with the aim of resolving all issues quickly and efficiently. We'd be grateful for your cooperation with us during this process by providing us with any relevant information that we made need.

If we have not come back to you within 30 days, or you are not happy with the response that you've received, you may submit a complaint to the Office of the Australian Information Commissioner. (opens in a new window; please note we can't be responsible for the content of external websites.)

We are committed to keeping your personal information secure and will take all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.

Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

USA

To learn more about our cookies and website 'track' and 'do not track' practices please see our Cookies Notice.

Canada

As your data may be transferred to third parties outside Canada, local police or other enforcement, regulatory or Government bodies may have access to that data, with or without our knowledge.

The personal data we process may be accessed by people within Unicorn Group, or by our third-party service providers, who require access for the purposes indicated in this Privacy Notice, or as may be permitted or required by applicable law. The personal data we collect is largely held in the UK.

If you have any questions, please contact us.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to



lodge a complaint with the Office of the Privacy Commissioner of Canada, (opens in a new window; please note we can't be responsible for the content of external websites) or in some Canadian provinces, your local Privacy Commissioner.

South Korea, Malaysia, Singapore, Qatar

Terms used in this Privacy Notice shall have the meanings assigned to them by the Personal Data Protection Act 2010 (also known as the PDPA).

By placing an order with us, opening an account, browsing our website and/or agreeing to receive digital direct marketing communications, you agree that we may process your personal data as described in this Privacy Notice and our Cookies Notice, including for analytics and research into website use.

Hong Kong

When you agree to receive direct marketing emails from us, we'll send you promotions on products we sell at Unicorn Group

If you are in Hong Kong you may submit a complaint to our UK office who will come back to you within 30 days. If we have not come back to you or you are not happy with the response that you receive, you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

17 - Further questions

If you have any further qestion contact us -

Unicorn Group,

Riverbank, The Green,

Tullynacross Road,

Lisburn, BT27 5SR

T:+44 (0) 28 9262 5898

E : info@unicorn-group.com