

The GDPR applies to information that directly or indirectly could identify an individual. This includes information, such as names, addresses, phone numbers, date of birth, as well as IP addresses, cookie identifiers, device information, advertising identifiers, financial information, geo-location information, social media information, consumer preferences, etc. To read more about the personal information that TheVeganHut captures, please visit our [User Privacy Notice below](#).

### [User Privacy Notice](#)



#### **What is Personal Information?**

Personal Information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We do not consider personal information to include information that has been anonymized or combined so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

We collect personal information from you when you use our Services.

We collect personal information from you and any devices (including mobile devices) you use when you: use our Services, register for an account with us, provide us information on a web form, update or add information to your account, participate in a community board discussion chat, or when you otherwise correspond with us.

Some of this personal information, that identify you, is necessary to enter into our User Agreement. The provision of all other personal information is voluntary but may be necessary in order to use our Services, such as the buying or selling information needed to conclude a transaction.

We may also collect personal information from other sources, as described below.

#### **Personal information you give us when you use our Services or register for an account with us**

- Identifying information such as your name, addresses, telephone numbers or email addresses when you register for an account with us.
- Buying or selling information you provide during a transaction, or other transaction-based content that you generate or that is connected to your account as a result of a transaction you are involved in.

- Other content that you generate, or that is connected to your account (such as adding items to your basket, adding items to your Wish List).
- Financial information (such as credit card or bank account numbers) in connection with a transaction.
- Postage, billing and other information used to purchase or send an item, as well as, where postal services are provided through one of our programs, information required to clear customs (such as Tax ID or other identification numbers if applicable) and relevant postage information (such as tracking numbers and tracking updates).
- In some instances, when you use our Services, you may provide age, gender, interests and favourites.
- You may also provide us other information through a web form, by updating or adding information to your account, through your participation in community discussions, member-to-member communications, chats, dispute resolution, or when you otherwise communicate with us regarding our Services.
- Additional information we are required or authorized by applicable national laws to collect and process in order to authenticate or identify you or to verify the information we have collected.

**Personal information we collect/may collect automatically when you use our Services or register for an account with us**

- We collect information about your interaction with our Services, your advertising preferences, and your communications with us. This is information we receive from devices (including mobile devices) you use when you access our Services. This information could include the following: Device ID or unique identifier, device type, ID for advertising, and unique device token.
- Location information, including location information from your mobile device. Keep in mind that most mobile devices allow you to control or disable the use of location services by any application on your mobile device in the device's settings menu.
- Computer and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address (as of now we collect only ip address), your browsing history, and your web log information.

**Personal information we may collect using cookies and similar technologies (as of now we are not using any cookies other than Facebook Login)**

- We use cookies, web beacons, unique identifiers, and similar technologies to collect information about the pages you view, the links you click, and other actions you take when using our Services, within our advertising or email content.
- For more information about our use of these technologies, and how to control them, see our cookies section under Terms and conditions for customers.

## Personal information collected from other sources

- We supplement the personal information we collect directly with information collected from third parties and add it to your account information. For example, we collect and use demographic and other information that is publicly available in an applicable jurisdiction, additional contact information, credit check information, and information from credit bureaus, as allowed by applicable national laws
- **Social Media.** We allow you to share information with social media sites or use social media sites to create your account or to connect your account with the respective social media site. Those social media sites may give us automatic access to certain personal information retained by them about you (e.g., content viewed by you, content liked by you, and information about the advertisements you have been shown or have clicked on, etc.). If you provide us with access to any site with video content, then you agree that we can share your video viewing with, or obtain information about your video viewing from, third-party social media sites for at least two years or until you withdraw authorization or connection to the social media site. You control the personal information you allow us to have access to through the privacy settings on the applicable social media site and the permissions you give us when you grant us access to the personal information retained by the respective social media site about you. By associating an account managed by a social media site with your account and authorizing us to have access to this information, you agree that we can collect, use and retain the information provided by these social media sites in accordance with this privacy notice. We may also use plug-ins or other technologies from various social media sites. If you click on a link provided via a social media plug in, you are voluntarily establishing a connection with that respective social media site.
- If you give us personal information about someone else, you must do so only with that person's authorization. You should inform them how we collect, use, disclose, and retain their personal information according to our privacy notice.



## How we use your personal information



We use your personal information to provide and improve our Services, provide you with a personalized experience on our sites, contact you about your account and our Services, provide you customer service, provide you with personalized advertising and marketing, and to detect, prevent, mitigate and investigate fraudulent or illegal activities.

We use the personal information we collect from you for a range of different business purposes and according to different legal bases of processing. The following is a summary of how and according to which legal bases we use your personal information.

**We use your personal information to fulfil a contract with you and provide you with our Services, to comply with our legal obligation, protect your vital interest, or as may be required for the public good. This includes:**

- To provide payment processing and account management, operate, measure and improve our Services, keep our Services safe, secure and operational, and customize site content that includes items and services that you may like in response to actions that you take.
- To contact you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed or as otherwise necessary to provide you customer service.
  - When contacting you for such purposes as outlined above, we may contact you via email, telephone, SMS/text messages and via postal mail.
  - When contacting you via telephone, to ensure efficiency, we may use autodialed or pre-recorded calls and text messages as described in our User Agreement and as authorized by applicable law. Message and data rates may apply.
- To provide other services requested by you as described when we collect the information.
- We use/may use general location information to provide you with location-based services (such as advertising, search results (as of now we use only businesses coming up in a given post code, in the search box), and other personalized content).
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.
- To enforce our User Agreement, this privacy notice, or other policies, and to monitor restrictions on offers to buy or sell outside of TheVeganHut and member-to-member communications for violations of our policies or applicable laws.

**We use your personal information to pursue our legitimate interests where your rights and freedoms do not outweigh these interests. We have implemented controls to balance our interests with your rights. This includes to:**

- Improve our Services, for example by reviewing information associated with stalled or crashed pages experienced by users allowing us to identify and fix problems and give you a better experience.
- Personalize, measure, and improve our advertising based on your advertising customization preferences.
- Contact you via email or postal mail in order to offer you coupons, discounts and special promotions, poll your opinions through surveys or questionnaires and inform you about our Services, as authorized by applicable law.
- Contact you about public policy matters, or other current events, related to your ability to use our Services. This could include an invitation to join a petition, letter writing, call or other sort of public policy related campaigns.
- Deliver targeted marketing, service updates, and promotional offers based on your communication preferences.
- Measure the performance of our email marketing campaigns (e.g. by analysing open and click rates).
- Measure sellers' performance (e.g. by using shipment tracking information that sellers and shipping providers send or provide through TheVeganHut).
- Monitor and improve the information security of our site and mobile applications.

**With your consent, we may use your personal information to:**

- Provide you with marketing via telephone calls, email, SMS or text.
- Provide you with marketing from third parties.
- Customize third party advertising you might see on third party websites.
- Use your precise geo-location to provide location-based services.
- Use your sensitive personal information to facilitate transactions in certain categories.

You have the right to withdraw your consent at any time.

We may use technologies considered automated decision making or profiling. We will not make automated-decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are required by law to use such technology.



**Your choices about how we use your personal information**

Close



You have choices about how we use your personal information to communicate with you, to send you marketing information, how we provide you with customized and relevant advertising, and whether you want to stay signed into your account.

### **Communication preferences**

You can control your email communication preferences in the Communication Preference section within your My Account under TheVeganHut. There, you can also control your communications preferences setting and choose which newsletters and promotions you want to receive.

### **Marketing**

If you do not wish to receive marketing communications from us, you can unsubscribe via the link in an email you received, change your Communication Preferences within My Account under TheVeganHut, indicate your communication preferences using the method described within the direct communication from us or contact us as described in the Contact Us section below. Keep in mind, we do not sell, rent, or otherwise disclose your personal information to third parties for their marketing purposes without your consent.

### **Advertising**

We don't engage in advertising using your data. We do not allow third parties to track or collect your personal information on our sites for their own advertising purposes, without your consent.

### **Staying Signed in**

When you sign in to your account on our Services, we give you the option to stay signed in to your account for certain amount of time. If you are using a public or shared computer, we encourage you not to choose to stay signed in. You or any other user of the computer/browser you signed in on will be able to view and access most parts of your account and take certain specific actions during this signed in period without any further authorization. The specific actions and account activities that you or any other user of this computer/browser may take include:

- Buy or sell an item
- Check out or add items to your cart
- Purchase an item with PayPal
- View the activity header
- View the My Account under TheVeganHut page
- View or edit the Watch List or order details
- View the profile page
- Send member-to-member messages
- Conduct after-sale activities, like leaving Feedback

If you attempt to change your password, User ID, update any other account information or attempt other account activity beyond those listed above, you may be required to enter your password.

You can typically end your signed in session by either signing out and/or clearing your cookies. If you have certain browser privacy settings enabled, simply closing your browser may also end your signed in session. If you are using a public or shared computer, you should sign out and/or clear your cookies when you are done using our Services to protect your account and your personal information.



### **Different ways you can access, have control and modify/correct your personal information**

We respect your right to access, correct, request deletion or request restriction of our usage of your personal information as required by applicable law. We also take steps to ensure that the personal information we collect is accurate and up to date.

- You have the right to know what personal information we maintain about you
- We will provide you with a copy of your personal information in a structured, commonly used and machine-readable format on request
- If your personal information is incorrect or incomplete, you have the right to ask us to update it
- You have the right to object to our processing of your personal information
- You can also ask us to delete or restrict how we use your personal information, but this right is determined by applicable law and may impact your access to some of our Services

### **Access, correction, and deletion of your personal information**

You can see, review and change most of your personal information by signing in to your account. Please, update your personal information immediately if it changes or is inaccurate. Keep in mind, once you make a public posting, you may not be able to change or remove it.

We will honor any statutory right you might have to access, modify or erase your personal information given in the site. To request access and to find out whether any fees may apply, if permitted by applicable national laws, please contact us following the instructions in the Contact Us section below. Where you have a statutory right to request access or request the modification

or erasure of your personal information, we can still withhold that access or decline to modify or erase your personal information in some cases in accordance with applicable national laws.

If you request that we stop processing some or all of your personal information or you withdraw (where applicable) your consent for our use or disclosure of your personal information for purposes set out in this privacy notice, we might not be able to provide you all of the Services and customer support offered to our users and authorized under this privacy notice and our User Agreement.

Upon your request, we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and in accordance with applicable national laws.



### **How your information will be shared?**

We may disclose your personal information to other members of the TheVeganHut organization or to third parties. This disclosure may be required for us to provide you access to our Services, to comply with our legal obligations, to enforce our User Agreement, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Services. We attempt to minimize the amount of personal information we disclose to what is directly relevant and necessary to accomplish the specified purpose. We do not sell, rent, or otherwise disclose your personal information to third parties for their marketing and advertising purposes without your consent.

We may disclose your personal information to the following parties for the following purposes:

TheVeganHut organization members, who may use it to:

- Provide joint content and services (like registration, transactions, and customer support)
- Help detect, investigate, mitigate and prevent potentially fraudulent and illegal acts, violations of our User Agreement, and data security breaches
- Provide you personalized advertising
- Improve their products, sites, applications, services, tools, and marketing communications.





- Members of TheVeganHut organization will use your personal information to send you marketing communications only if you have consented to receive such communications from them or if otherwise permitted by the law.

#### **Service Providers and financial institutions partners as follows:**

- Third party service providers who help us to provide our Services, payment processing services, assist us in providing customize advertising, to assist us with the prevention, detection, mitigation, and investigation of potentially illegal acts, violations of our User Agreement, fraud and/or security breaches, bill collection, affiliate and rewards programs, co-branded credit cards and other business operations.
- Third party financial institutions with whom we partner to offer financial products to you, for them to provide joint content and services (such as, registration, transactions and customer support). These third party financial institution partners will use your personal information to send you marketing communications only if you have requested their services.
- Third party shipping providers (e.g., Royal Mail, DHL, UPS, USPS etc.) with whom we share delivery address, contact information and shipment tracking information for the purposes of facilitating the delivery of items purchased and other delivery related communications.
- Third party providers of websites, applications, services and tools that we cooperate with so that they can publish or advertise your listings and their content on their websites or in are not permitted to sell, lease or in any other way transfer the personal information included with your transactions to third parties.

#### **Law enforcement, legal proceedings, and as authorized by law**

- To comply with our legal requirements, enforce our User Agreement, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property or safety.
- To law enforcement or governmental agencies, or authorized third-parties, in response to a verified request or legal process relating to a criminal investigation or alleged or suspected illegal activity or any other activity that exposes us, you, or any other of our users to legal liability. We will only disclose information we deem relevant to the investigation or inquiry, such as name, city, state, postcode, telephone number, email address, User ID history, IP address, fraud complaints, bidding and listing history.
- To credit agencies or bureaus as authorized by applicable national laws (e.g. information on late or missed payments or other defaults on your account that may be reflected in your credit report or file).
- To third parties involved in a legal proceeding, if they provide us with a subpoena, court order or substantially similar legal basis, or we otherwise believe in good faith that the

disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

### **We may disclose your personal information to PayPal Inc. and its corporate family**

- To prevent, detect, mitigate, and investigate potentially illegal acts, fraud and/or security breaches, and to assess and manage risk, including to alert you if fraudulent activities have been detected on your e TheVeganHut or PayPal accounts
- To provide customer services, including to help service your account or resolve disputes (e.g., billing or transactional disputes)
- To facilitate the processing of payment cards when you pay within our Services with a payment card and we use PayPal to process your payment
- To facilitate shipping and related services for purchases you made using PayPal

### **Change of Ownership**

If we are subject to a merger or acquisition with/by another company, we may share information with them in accordance with our global privacy standards. Should such an event occur, we will require that the new combined entity follow this privacy notice with respect to your personal information. If we intend to handle your personal information for any purposes not covered in this privacy notice, you will receive prior notification of the processing of your personal information for the new purposes.



### **Duration of the storage of your personal data.**

We retain your personal information for as long as necessary to provide the Services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our policies.

Our specific retention times for personal information are documented in our regional records retention schedules. How long we retain personal information can vary significantly based on context of the Services we provide and on our legal obligations. The following factors typically influence retention periods:

- How long is the personal information needed to provide our Services? This includes such things as maintaining and improving the performance of our products, keeping our

systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most of our data retention periods.

- Is the personal information sensitive? If so, a shortened retention time is generally appropriate.
- Have you provided consent for a longer retention period? If so, we will retain data in accordance with your consent.
- Are we subject to a legal, contractual, or similar obligation to retain your personal information? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or personal information retained for the purposes of litigation.

After it is no longer necessary for us to retain your personal information, we will dispose of it in a secure manner according to our data retention and deletion policies.



### **Cookie Information**

When you visit or interact with our sites, services, applications, tools or messaging, we or our authorized service providers may use cookies and other similar technologies to help provide you with a better, faster, and safer experience, and for advertising and marketing purposes.



### **Protection of personal information**

We protect your personal information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our servers provided by the security regulations of our third party owned server and information access authorization controls.