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**Privacy & Cookie Policy!**

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Tiny Treasures is committed to protecting your personal information. We have published this Privacy policy to ensure that you are fully aware of what personal information we collect from you, how we use it, who we share it with and what your rights are. We have written our Privacy Policy to make it clear, simple and easy to read. We like to make things easier for our customers and that means being clear and open about how and why we use your personal information. We hope that you find it useful and informative.

Tiny Treasures are committed to respecting your privacy. This notice is to explain how we may use personal information we collect when you:

• browse our website.

• place an order for goods or services.

• communicate with us about your order or purchase.

• contact us about goods or services you are considering ordering.

• interact with us on social media.

• otherwise make an enquiry.

• enter surveys, competitions and prize draws.

• sign up to receive marketing emails;

• participate in user-testing.

• provide feedback on our products, goods and services.

 References to we, our or us in this privacy notice are to Tiny Treasures, we have appointed a Data Compliance Officer to oversee our compliance with data protection laws. Contact details are set out in the “Contacting us” section at the end of this privacy notice.

**PERSONAL INFORMATION**

When you interact with us, particularly when you purchase goods or services from us, you may provide us with personal information about you. The information we may obtain includes:

• personal contact details such as title, name, billing/delivery address, telephone numbers, email addresses.

 • number, date of birth and gender of any dependents.

• date of birth of any expected dependents.

• gender.

• purchase history.

• details of your interactions with us online or via email.

• details of your visits to our website, which site you came from, when visiting ours.

• information gathered using cookies in your web browser. Learn more about how we use cookies and similar technologies by reviewing our cookie policy

• click through rates on email marketing campaigns using Pixels.

 • personal details which help us to recommend items of interest.

• your payment card information.

• your comments and product reviews.

• 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.

• your social media username.

• We will also collect personal data when you sign up to receive marketing emails (online), and you pay for your order using Klarna or via the wix platform. • Depending on the nature of our interactions with you, there may be certain essential personal information that we have to collect from you so that we can provide you with the goods or services that you have requested. This will vary depending on the relationship we have with you.

• We may also ask you for additional personal information which it is optional for you to provide but which will allow us to improve the service that we provide to you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your circumstances and preferences such as your baby’s due date to allow us to better tailor our parenting support emails and specific goods and services which we consider to be relevant to you as a purchaser of goods and services for the various stages in a baby’s early development.

• We will always aim to make it clear which personal information it is necessary for you to provide, and which personal information is optional. However, if you are unsure as to whether you are required to provide any piece of personal information please ask. • If you do not want to provide your personal information, we will not be able to enter a contract with you, process your order or answer any query.

**USES MADE OF THE INFORMATION**

We are committed to protecting your privacy and will only use your personal information in accordance with applicable data protection legislation, including the UK General Data Protection Regulation and the Data Protection Act 2018. Specifically, we may use your personal information as follows:

• to perform our obligations in respect of our agreement with you, including:

• fulfilling any order that you place.

• dealing with queries (including issues, returns, payment and repairs).

• authorising payments.

• dealing with a complaint or issue you have raised.

• where you have expressly consented to us doing so, including:

• where you have requested that we keep you up to date with marketing communications, news and updates, to provide you with the types of updates that you have asked to receive by the means of communication that you have asked us to use.

• where you make an enquiry or request any information, to respond to that enquiry and provide the requested information.

• when you sign up to prize draws, surveys and competitions; and

• when you provide a product review or other similar feedback.

 • where it is necessary for compliance with legal obligations, including:

• for record keeping and regulatory compliance purposes; and

• for carrying out checks to prevent money laundering.

• managing any accidents, injuries or health incidents which occur in store.

• dealing with any product issues with safety or quality issues, including potential and proposed safety advisory notices and recalls, including of third-party products we supply, in speaking with the supplier and their advisors in connection with the same.

• dealing with any related insurance or legal claims made by you and made by us or received by us.

• where we otherwise have a legitimate interest in doing so, including:

• carrying out checks and responding to appropriate requests to prevent fraud to protect and the impact of dishonest activity.

• undertaking surveys or market research to enable us to improve the service we offer.

• analysing interests, trends, habits and website journeys, including suggesting additional products and services including support and development campaigns which may be of interest to you based on your browsing and purchase history; and

• monitoring our customers’ views or opinions of our company and product and services via social media.

• to inform our business decisions relating to the products feedback and product that you like; and

• ensuring that our website is presented in the most effective manner for you and your computer and tracking your use of our website through the use of cookies and log files, including third party log files advised in our cookie notice and cookie banner (and subject to consents provided in that process) to help us to provide a positive user experience by offering relevant product selections and linked products on our same site and improve and to increase usage of our website, also see our cookie policy.

• Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, by means of unsubscribe notices, which you may do by using unsubscribe links in any of our communications with you, or by contacting us as described in paragraph 13. Please note however that the withdrawal of your consent will not affect any use of your personal information made before you withdrew your consent.

**SHARING OF YOUR PERSONAL INFORMATION**

We may share your personal information with:

• providers of outsourced services, such as hosting and IT support or maintenance services (to the extent necessary for the provider to provide those outsourced services to us).

• card payment processors (including wix, Paypal, Shopify Payments, Apple Pay, Google Pay, Shop Pay and CyberSource Corporation).

 • finance companies (including Klarna).

• wix our platform provider and it’s authorized subcontractors.

• survey and marketing companies (including Dot Digital, Survey Monkey, Text Anywhere and, Trustpilot and Feefo).

• Suppliers and other retailers to which we retail on a wholesale basis and or/ and are supplied by those companies on a wholesale basis.

• professional advisors (including lawyers, accountants and insurers).

• the prospective seller or buyer of any business or assets in the event that we sell or buy any business or assets, and their authorized advisors; and

• delivery companies and third-party product suppliers and their supply chain partners. • supply chain partners. We may also share your personal information with third parties if we are under a duty to share your personal information in order to comply with any legal obligation, or in order to enforce or apply such other terms as apply to our relationship, or to protect the rights, property, or safety, and non-harassment of our customers, our colleagues /ourselves or others. This includes exchanging information with other companies and organisations for the purposes of manufacturer and warranty claims, customer service with third party suppliers, fraud protection investigations and credit risk reduction.

**Children's Data**

Our services are not intended to be used by children, and we do not knowingly collect any personal information about children. If you are the parent or guardian of a child who has provided us with their personal information, you may contact us using the contact details set out below to request that it be deleted.

As of the Effective Date of this Privacy Policy, we do not have actual knowledge that we “share” or “sell” (as those terms are defined in applicable law) personal information of individuals under 16 years of age.

**TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE UNITED KINGDOM / ROI**

In certain cases, the sharing of your personal information to a third party as described above may involve your personal information being transferred outside of the United Kingdom (or ROI for customers in ROI). This may be to:

• a country that is considered to have data protection rules that are equivalent to those in the United Kingdom; or

• a country which is not considered to have the same standards of protection for personal data as those in the United Kingdom, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate undertaking International Data Transfer Assessment putting in place contractual terms approved under the UK GDPR and Data Protection Act 2018.

**RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION**

Where you provide us with personal information we may retain this information for future use, including:

• undertaking surveys or market research regarding your purchase or regarding your experience of dealing with us.

• providing you with news and updates of a type you have agreed to receive.

• monitoring fraud and other illegal or unlawful activity; and

• regulatory and record keeping purposes including in the event of a product issue or insurance claim relating to an infant user of the product.

• The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirement. After this date, the personal information will be moved to a secure encrypted and Pseudoanonymised archive where it will be stored for a further 23 years to satisfy legal obligations relating to product recalls and personal injury claims.

• If you have consented for us to contact you for marketing purposes, we will store your personal information for up to 365 (usually 300) days during which time we shall ask you to re-consent and /or unsubscribe to our contacting you for marketing purposes depending on the nature of the activity and communication with you.

• It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You may be able to update some of the personal information we hold about you through your online account as a self-service for selected changes. Alternatively, if the changes made cannot be processed as self-serve, please promptly contact us using the details in paragraph 13. This also applies to third party nominated contacts recorded on the account as provided by you.

• If you wish to stop receiving any information from us, such as marketing communications news and updates, you can unsubscribe via the link at the end of each marketing email or by contacting us using the details in paragraph 13. It may take up to 14 working days to unsubscribe you from marketing databases though it is usually completed in around 24 hours.

• Your decision to stop receiving information from us may result in the deletion of some of the personal information that we hold about you, but we may still retain personal information we require for other purposes, including where it is required for financial and legal and business record keeping purposes, including in relation to the use of third party delivery partners and in the event of product quality assurance or safety claims and communications.

• In certain circumstances you may be entitled to request the erasure of personal information that we hold about you. To make a request of this nature, please contact us, providing full details of the personal information you want to be erased and the reason(s) for your request. We will consider all requests upon receipt and confirm to you whether we are able to agree to your request.

**International Users**

Please note that we may transfer, store and process your personal information outside the country you live in. Your personal information is also processed by staff and third-party service providers and partners in these countries.

If we transfer your personal information out of Europe, we will rely on recognized transfer mechanisms like the European Commission's Standard Contractual Clauses, or any equivalent contracts issued by the relevant competent authority of the UK, as relevant, unless the data transfer is to a country that has been determined to provide an adequate level of protection.

**COOKIES AND LOG FILES**

• When you browse our website, we may use “cookies” to keep track of your visit and give you a better browsing experience.

**What cookies do we use?**

We use the following cookies on our websites and apps:

* **Strictly necessary Cookies.** These cookies are necessary for the website to function and cannot be switched off. They are used, for example, to make sure your transaction is secure, to enable you to log in to the secure areas of your account, such as your order history and to add items to your basket. Blocking these cookies through your browser will mean that some parts of our website won’t work.
* **Performance Cookies or analytical Cookies.** These cookies allow us to monitor visitors to our websites and ensure it is performing correctly. We use this data to measure overall performance, improve your website experience and improve the design of our website.
* **Functionality Cookies.** These cookies enable enhanced functionality on our website, such as allowing you to add to favourites or remember your language preferences.
* **Onsite Targeting: Marketing and Personalisation Cookies.** These cookies are placed by us and are used to help us to build an understanding of your interests (for example by understanding what products you have browsed on our website) and show you products, services and advertisements relevant to you whilst you are on the website. These cookies make it possible for us to personalise your experience on the websites and (if you are subscribed) in our email marketing.
* **Off Site Targeting: Marketing and Personalisation Cookies.**These cookies are placed by our advertising and marketing partners (including social networks). These help us to build an understanding of your interests (for example by understanding what products you have browsed on our website) and show you products, services and advertisements relevant to you. These cookies make it possible for us to ensure that you don’t see irrelevant, duplicate or multiple ads from us in a short period of time. We do want to prevent ads continuously re-appearing and annoying you.

Alternatively, most web browsers allow some control of most cookies through the browser settings. To find out more about how to manage cookies, including how to delete cookies, visit [www.allaboutcookies.org](https://allaboutcookies.org/.org)

**SECURITY**

• The protection of your personal information is very important to us and we have in place various security measures to ensure that your personal information is kept secure.

• However, you should be aware that the method you use to get in contact with us, such as email or post, may not be entirely secure and your personal information may be susceptible to being intercepted in transit. Equally, your personal information is at risk if a malicious third party gains access to your account on our customer portal or to any other place where your personal information is stored, such as your email account.

• You should therefore take all reasonable steps to keep your personal information secure, including choosing a secure password for your account, changing it regularly, and protecting access to and security of your email account or other forms of authentication and not disclosing your passwords to anybody else. You should use a unique password for every account.

**LINKS TO OTHER WEBSITES**

Where we provide links to third party websites, this privacy notice does not cover how those organisations process personal information. We encourage you to read the privacy notices on the other websites you visit. YOUR RIGHTS You have the following rights in relation to your personal information:

• The right to be informed about the collection and use of your personal data.

• The right of access to obtain a copy of their personal data, as well as other supplementary information.

• The right to rectification of any errors in your personal information.

• The right to request the erasure of your personal information in certain limited circumstances.

• The right to restrict processing of your personal information where certain requirements are met; and

• The right to object to the processing of your personal data at any time, which will be exercised promptly for marking consent updates, or be considered alongside the legitimate interests that we have in retaining certain data in other contexts; and • The right to portability and access to your personal data to move it to another organization or to obtain a copy of it for your own use. We do not use your personal information to make automated decisions about you. Any application with a third-party provider such as your payment provider, and any application for finance through Klarna will be subject to the policies of those organisations. We do undertake referrals for factual validation of delivery, alternative delivery, payment and banking data and to audit our internal processes. This privacy notice sets out a general summary of your legal rights in respect of personal information.

**ENQUIRIES, ISSUES AND COMPLAINTS**

• You are entitled by law to ask for a copy of your personal information at any time. Please contact us using the details in paragraph 13.

• In the unlikely event that you have any concerns about how we use your personal information, please contact us as described in paragraph 13. This includes situations where you want to request the rectification or erasure of your personal information, restrictions to be placed around how we use your personal information, or if you wish us to consider your objection to a particular use.

• If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure. In the first instance it will be reviewed by our customer care team who will respond to you in writing. If you are dissatisfied with this response you may request that your complaint be escalated, in which case it will be passed to a senior person in our business who will review your complaint and the initial response and provide an initial further response typically within a further 30 days, or when their investigation is completed.

**CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our website. You can also obtain an up-to-date copy of our privacy notice by contacting us as described in paragraph. Should you object to any alteration, please contact us. CONTACTING US If you need to contact us about this notice or any matters relating to the personal information, we hold on you.

**FURTHER INFORMATION**

We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 13 above. Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner’s website at https://ico.org.uk/your-data-matters/.

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