



PRIVACY POLICY

1. INTRODUCTION

1.1 In this Privacy Policy:

- 1.1.1 references to **we, us or our** means naughtone, a company registered in England (company number: 05285557), whose registered office is naughtone, Unit D, Knaresborough Technology Park, Manse Lane, HG5 8LF. Our VAT registration number is 859435287;
- 1.1.2 references to **you or your** means the person whose personal information that we collect, use and process. This includes anyone who contacts us in connection with the products and services we provide or otherwise interacts with us; and
- 1.1.3 references to naughtone include the following companies:
 - (a) naughtone, Knaresborough Technology Park, Manse Lane, HG5 8LF
 - (b) naughtone manufacturing, Unit B, 11 Warhurst Road, Lowfields Business Park, Elland, HX5 9DF
 - (c) naughtone showroom, 6 Bakers Yard, Clerkenwell, London, EC1R 3DD
 - (d) naughtone showroom, Suite 10-110, 222 Merchandise Mart Plaza, Floor 10, Chicago, IL, 60654
 - (e) Any other naughtone owned entities worldwide

2. PRIVACY POLICY

- 2.1 This Privacy Policy sets out the basis on which we collect and use personal information about you.
- 2.2 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we may disclose it to and your rights and choices in relation to your personal information.
- 2.3 In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the products and services that we provide or your other interactions with us (including through naughtone.com (the **Website**)).
- 3.2 We are the data controller because we determine the purpose for which your personal information is used and how we use your personal information.

4. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

4.1 We collect and use personal information about you in the course of providing our products and services. The personal information we collect includes:

4.1.1 Information that you provide to us

The information that you provide to us may include the following:

Type of Personal Information	Examples
General	
Contact information	Name, address, email and telephone number
General information	Gender and date of birth
Financial	
Financial information and account details	Payment card number (credit or debit card), bank account number, or other financial account number and account details
Order History	
Order history	Information regarding the products and services that we provide to you
Smart Furnishing	
Information regarding your smart furnishing preferences	Information relating to your furniture preferences for example, fabric choice
Warranty Claims	
Warranty claim information	Information relating to warranty claims made by you regarding our products
Marketing Preferences	
Marketing preferences, marketing activities and customer feedback	Marketing preferences, to provide you with updates regarding our products and services (including our newsletter)

This information may be provided:

- (a) by filling in forms, including those on the Website;
- (b) when you carry out transactions with us;
- (c) when you communicate with us (including by e-mail and SMS);
- (d) when you use our products and services;
- (e) if you make a warranty claim regarding our products; and
- (f) if you report a problem with our products or services.

4.1.2 Information we collect from you

Type of information	Method of data collection	Examples
Images of you	CCTV	CCTV footage in which you feature if you visit our premises
Technical information	[Through your internet browser or electronic device]	Certain information is collected by most websites or automatically through your electronic device, such as your IP address (i.e. your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, electronic device manufacturer and model, language, time of the visit, pages visited, and the name and version of the services (such as the App) you are using. We use this information to ensure that the services function properly
Technical information	Through your use of an App	When you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your electronic device accesses our servers and what information and files have been downloaded to the App based on your device number. We may also need to access external storage for logs, Location access for beacon identification, access to photos media and files and Bluetooth connection information.
Technical information	Using cookies and online tracking	Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognize your device and to collect information such as internet browser type, time spent using the Website, pages visited, language preferences and relevant country website. For more detailed information about the cookie and tracking technology we use, see section 10 below.

4.1.3 Information we receive from other sources

- (a) lead information from third parties regarding your interest in our products and services; and
- (b) information we obtain from publically available sources such as Facebook or LinkedIn.

5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

5.1 We use your personal information in connection with the provision of our products and services to you. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
To communicate with you and other individuals	This processing is carried out for our business purposes, because it furthers our commercial aims and objectives and enables us and to communicate with you about future services We may also communicate with you to perform any contractual obligations in relation to the provision of the past and current goods and services
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the goods or services	The processing is necessary for the performance of a contract between you and us. For example, the sharing of personal data to enable the installation of products or in certain circumstances to process payment information from you for our products and services
To sell and distribute our goods and services	This processing is carried out for our legitimate business purposes, because it enables to sell and distribute our goods

Purpose	Legal Basis
To notify you about changes to our products and services	This processing is carried out for our legitimate business purposes, because it enables us to provide you with service communications regarding our products and services
To improve the quality of our products and services	This processing is carried out for our legitimate business purposes, because it furthers our commercial aims and objectives and enables us to improve our products and services
To manage complaints, feedback and queries	This processing is carried out for our legitimate business purposes, because it furthers our commercial aims and objectives, it allows us to respond to complaints, feedback and queries and enables us to improve our products and services
To respond to warranty claims regarding our products	This processing is carried out for our legitimate business purposes, because it enables us to consider and respond to warranty claims from your regarding our products and services
To carry out satisfaction surveys, market research and analysis	This processing is carried out for our legitimate business purposes, because it furthers our commercial aims and objectives and enables us to improve our products and services
To provide you with information about the services we offer (including details of our products and services which we believe may be of interest to you) in accordance with your preferences as indicated when you entered into any agreement with us, including any marketing consent preferences	This processing is carried out in accordance with consent given by you
To comply with any legal or regulatory obligations (including in connection with a court order)	This processing is necessary for us to comply with the law
To enforce or apply the agreements concerning you (including agreements between you and us)	Depending on the circumstances, the processing is carried out for our legitimate business purposes in order to conduct and manage our business or in connection with legal proceedings (i.e. the establishment, exercise or defence of legal claims)

5.2 Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

- 5.2.1 pursuit of our commercial activities and objectives, or those of a third party;
- 5.2.2 compliance with applicable legal and regulatory obligations and any codes of conduct;
- 5.2.3 improvement and development of our business operations and service offering, or those of a third party; or
- 5.2.4 protection of our business, shareholders, employees and customers, or those of a third party.

6. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

6.1 You agree that we may share your personal information with:

Type of third party	Examples
General	
Our group companies	Other companies and entities within naughtone
Our service providers and business partners	Our business partners (including dealers and distributors of Herman Miller products), suppliers and sub-contractors for the performance of any contract we enter into with you (for example, providers of third party information technology systems and services)
Our professional advisers	Including accountants, lawyers and other professional advisers that assist us in carrying out our business activities
Law Enforcement and Regulation	
Police and law enforcement agencies	We may share personal information with the police and other law enforcement agencies in connection with the prevention and detection of crime
Regulatory bodies	We may share personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties

6.2 We may also disclose your personal information to other third parties, for example:

- 6.2.1 in the event that we sell or buy any business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets;
- 6.2.2 if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
- 6.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply an agreement that we have entered into with you.

7. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

- 7.1 If we transfer personal information outside the European Economic Area (EEA), we will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law.
- 7.2 If we transfer personal information outside the EEA we will take reasonable steps to ensure that such information will be adequately protected as required by applicable data protection law. For example:
 - 7.2.1 where your personal information is transferred to naughtone, the safeguards which we typically put in place are the European Standard Contractual Clauses as permitted by data protection law and in particular Article 46(2) of the General Data Protection Regulation 2016/679; and
 - 7.2.2 where your personal information is transferred to naughtone in the United States such transfers are completed under the Privacy Shield framework. naughtone is certified under the Privacy Shield framework.
- 7.3 For further information as to the safeguards we implement please contact sales@naughtone.com
- 7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Website and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

8. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

We will hold onto your information for as long as required to either continue the business relationship or you wish to be provided with our product or marketing information. We may also be required to keep details in order that we can fulfil our warranty obligation for any purchases you make. We may require to hold onto the information for longer in cases where you may have dealt with our customer care team.

if it is reasonably necessary may also be required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also keep hold of your information as required.

9. YOUR RIGHTS

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details below.

Right	Summary of your rights	How to contact us
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions. We may also require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require).	Using the details set out at section 12.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.	Using the details set out at section 12.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.	Using the details set out at section 12.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, is the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.	Using the details set out at section 12.
On and from 25 May 2018, the following additional rights will be available to you.		
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with our legal obligations. We may still be able to use your personal information to fulfil any legal obligations we may have and for the establishment, exercise or defence of legal claims.	Using the details set out at section 12.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information (as set out below) and we are verifying whether our grounds for the use of your personal information override your objection.	Using the details set out at section 12.

Right	Summary of your rights	How to contact us
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.	Using the details set out at section 12.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party).	Using the details set out at section 12.

10. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

11. CONTACT US

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by email at sales@naughtone.com. By post at naughtone, Unit D, Knaresborough Technology Park, Manse Lane, HG5 8LF or telephone at 01423 816500

This Privacy Policy was last updated in May 2018.