

Privacy Policy

Protecting your Personal Details on our Website

Last updated: 22/09/2010

We know that you care how information about you is used and shared, and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy and forms part of the terms and conditions of our website.

By accepting our Website Conditions or by visiting our website at 'www.personalnovel.co.uk' you are accepting and consenting to the practices described in this Privacy Policy.

The Website is brought to you by Jan-Christoph Goetze trading as PersonalNOVEL, of 90 Long Acre, Covent Garden, London WC2E 9RZ. We believe that it is important to protect your Personal Data (as defined in the Data Protection Act 1998) and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data, and it tells you certain things we will, and will not, do. You should read this Privacy Policy in conjunction with the Website Conditions.

When we first obtain Personal Data from you, or when you order a new product from us, we will give you the opportunity to tell us whether you do, or do not, want to receive information from us about other products. You can normally do this by ticking a box on an application form or contract. You may change your mind at any time by e-mailing us at the address given in Clause 7 below.

Definitions:

'Personal Information' means any Personal Data that we may hold about you from time to time;

'PersonalNOVEL' and 'we/us/our' mean Jan-Christoph Goetze trading as PersonalNOVEL, of 90 Long Acre, Covent Garden, London WC2E 9RZ;

'Privacy Policy' means this privacy policy in its current form;

'Product' means a product displayed for sale on the Website;

'United Kingdom' means England, Wales, Scotland, Northern Ireland and the Channel Islands;

'Website' means the website located at www.personalnovel.co.uk or any subsequent URL which may replace it or sit alongside it;

'Website Conditions' means the terms and conditions of this website in their current form, of which this Privacy Policy forms part;

'Working Day' means Monday to Friday (excluding public holidays in England);

'you/Buyer/User' means a user of the Website.

1. Collecting Information

We may collect Personal Data about you from a number of sources, including the following:

- 1.1. From you when you agree to take a Product from us, in which case this may include your contact details, date of birth, how you will pay for the Product, and your bank or payment card details, as well as any further information that you may provide to enable us to personalise the Product in the way requested by you;
- 1.2. From you when you contact us with an enquiry or in response to a communication from us, in which case this may tell us something about how you use our services;
- 1.3. From documents that are available to the public, such as the electoral register.

2. Using Your Personal Information

- 2.1. Personal Data about our customers are an important part of our business; however, we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:
 - 2.1.1. To help us to identify you when you contact us.
 - 2.1.2. To help us to identify Products or selected partners which you might be interested in from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).
 - 2.1.3. To help us to administer your account and to contact you about improved Products we have provided before, do provide now or will or may provide in the future.
 - 2.1.4. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information.
 - 2.1.5. To help to prevent and detect fraud or loss.
 - 2.1.6. To allow us to contact you in any way (including mail, e-mail, telephone, visit, text or multimedia messages) about products offered by us and selected partners, unless you have previously asked us not to do so.
 - 2.1.7. To allow us to contact you in any way (including mail, e-mail, telephone, visit, text or multimedia messages) about our special offers to existing

- customers.
- 2.1.8. To enable us to send you our Newsletter. If you do not wish to receive this benefit, please contact our Data Protection Manager at the address given in Clause 7 below.
 - 2.1.9. We may monitor and record communications with you (including phone conversations and e-mails) for quality assurance and compliance.
 - 2.1.10. We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.
- 2.2. The use of certain services on our Website, such as newsletters, requires prior registration and involves more substantial processing of personal data, such as longer-term storage of e-mail addresses and names. We only use such data insofar as they have been sent to us by you in person and you have given us your prior consent for this use.
- 2.3. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.
- 2.4. We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:
- 2.4.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
 - 2.4.2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
 - 2.4.3. We employ companies and individuals to perform functions on our behalf and we may disclose your Personal Data to these parties for the purposes set out in Clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit and debit card payments and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use these for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the Data Protection Act 1998. From time to time, these other people and organisations to whom we may pass your Personal Data may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your Personal Data are

treated securely and in accordance with this Privacy Policy and the Data Protection Act 1998.

- 2.5. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.
- 2.6. "This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above."

3. Protecting Information

We have strict security measures to protect Personal Data.

- 3.1. We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- 3.2. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 3.3. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

4. The Internet

- 4.1. If you communicate with us using the Internet, we may occasionally e-mail you about our products. When you first give us Personal Data through the Website, we

will normally give you the opportunity to say whether you would prefer us not to contact you by e-mail. You can also always send us an e-mail (at the address set out below) at any time if you change your mind.

- 4.2. **Please remember that communications over the Internet, such as e-mails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered – this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.**
- 4.3. We may use 'cookies' to monitor how people use our site. This helps us to understand how our customers and potential customers use the Website so that we can develop and improve the design, layout and function of our sites. A cookie is a piece of information that is stored on your computer's hard drive through your browser, to recognise your browser and which records how you have used a website. This means that when you go back to that website, it can give you tailored options based on the information it has stored about your last visit. You can normally alter the settings of your browser to prevent it from accepting cookies.
- 4.4. If you do not want us to use cookies in your browser, you can set your browser to reject cookies or to tell you when a website tries to put a cookie on your computer. However, you may not be able to use some of the features on our website without cookies.

5. Turning Off Cookies in Different Browsers

The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

6. Links

- 6.1. The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer Personal Data to these advertisers or third-party websites.
- 6.2. These third-party websites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising

content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called "ad networks" or "network advertisers"), including information about how to opt-out of their information collection.

- 6.3. We exclude all liability for loss that you may incur when using these third party websites.

7. Further Information

- 7.1. If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, PersonalNOVEL, 90 Long Acre, Covent Garden, London WC2E 9RZ, or e-mail us at service@personalnovel.com.
- 7.2. We may amend this Privacy Policy from time to time without notice to you, in which case we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
- 7.3. You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by e-mailing us at service@personalnovel.com. This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 7.4. If you would like access to the Personal Data that we hold about you, you can do this by e-mailing us at service@personalnovel.com or writing to us at the address noted above. There may be a nominal charge of £10 to cover administrative costs.
- 7.5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete or correct these promptly. Please e-mail us at service@personalnovel.com or write to us at the address above to update your Personal Data.