

Introduction

This policy, along with:

- our terms and conditions of sale (the **Ts & Cs**), where you purchase products from us;
- any additional terms incorporated by reference into the Ts & Cs,

apply to your use of:

- the 'My Instant Stylist' mobile application (the **App**) once you have downloaded a copy of the App onto your mobile/handheld device;
- the My Instant Stylist website located at myinstantstylist.com (the **Site**);
- any of the services accessible through the App and/or the Site (the **Services**).

This policy sets out the basis on which any personal data relating to you will be processed by us. The App, the Site and the Services are not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This privacy policy should be read together with any other privacy policies that we may provide on specific occasions; this privacy policy supplements those other privacy policies and is not intended to override them.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
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1. Important information and who we are

My Instant Stylist Ltd (referred to as **My Instant Stylist, we, us** and **our** in this privacy policy) is the controller and responsible for your personal data.

We have appointed a data privacy manager. If you have any questions about this privacy policy (including any requests to exercise your legal rights), please contact them using the details set out below.

Contact details

Our full details are:

- company number: 13254286
- incorporated and registered in: England and Wales
- registered address: The Old Barn, Wood Street, Swanley, Kent, BR8 7PA
- e-mail address: info@myinstantstylist.com

You have the right to make a complaint at any time to **the Information Commissioner's Office**, the UK regulator for data protection issues.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on **[13th May 2022]**. It may change and, if it does, these changes will be posted on the Site at www.myinstantstylist.com and in the App and (where appropriate) will be notified to you by SMS, e-mail and/or when you next use the App/Site. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App, the Site and the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

From time to time, the App and the Site may contain links to and from the websites and applications of our partners and affiliates. Please note that these websites and applications have their own privacy policies and we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites and applications. Please check these policies before you submit any personal data to these websites or applications.

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Contact Data
- Device Data
- Identity Data
- Marketing and Communications Data
- Profile Data
- Technical Data

- Transaction Data
- Usage Data

We explain these categories of data here.

We also collect, use and share aggregated data (such as statistical or demographic data) for various purposes. In certain circumstances, aggregated data may be (wholly or in part) derived from your personal data (see below) but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on our website or app. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data and will treat it in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We will collect and process the following data about you:

- **information you give us.** This is information (including Contact Data, Identity Data, Marketing and Communications Data, Profile Data and Transaction Data) that you provide to us about you by filling in forms on the App and the Site or by corresponding with us (for example, by email or chat). It includes information you provide when you:
 - create an account via the App or the Site;
 - make a purchase from us;
 - contact us. For example, when you report a problem with the App, the Site or the Services;
 - request marketing be sent to you;
 - enter a competition, promotion or survey;
- **information we collect about you and your device.** Each time you use the App or visit the Site, we will automatically collect personal data (including Device Data, Technical Data and Usage Data). We collect this data using cookies;
- **information we receive from other sources, including third parties.** We will receive personal data about you from various third parties, as set out below:
 - where someone has purchased a gift for you from us, they provided us with your Contact Data and Identity Data;
 - we will receive Financial Data and Transaction Data from the following payment service providers:
 - Stripe Payments Europe, Limited;

- we will receive Transaction Data from the following delivery service providers:
 - Bagged2U Ltd t/a 'Tryd'.

Cookies

We use cookies to distinguish you from other users of the App and the Site and to remember your preferences. This helps us to provide you with a good experience when you use the App and the Site and also allows us to improve them. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy.

4. How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- where you have consented to the processing;
- where we need to perform the contract we are about to enter into (or have entered into) with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

We will only send you direct marketing communications by e-mail or text where we have your consent. You have the right to withdraw that consent at any time by contacting us.

Purposes for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To register you as a new user.	Contact Identity Profile	Consent
To tailor orders to your specifications. For example, ensuring that clothing we send to you is the correct size.	Contact Identity Profile	<ul style="list-style-type: none"> • Where you have placed an order (whether for yourself or as a gift order for someone else), performance of a contract with you. • Where someone has purchased a gift for you, necessary for our and the purchaser's legitimate interests (to

		perform our contract with them).
To process and deliver orders and the Services, including: managing payments, fees and charges; transferring certain information to our delivery and payment service providers.	Contact Financial Identity Marketing Communications and Transaction	<ul style="list-style-type: none"> Where you have placed an order (whether for yourself or as a gift order for someone else), performance of a contract with you. Where someone has purchased a gift for you, necessary for our and the purchaser's legitimate interests (to perform our contract with them).
To collect and recover money owed to us.	Contact Financial Identity Transaction	Necessary for our legitimate interests (to recover debts due to us).
To notify you about changes to our terms or privacy policy.	Contact Identity Marketing Communications and	Necessary to comply with a legal obligation.
To request and enable you to leave a review or take a survey.	Contact Identity Marketing Communications and Profile Usage	Necessary for our legitimate interests (to study how customers use our products and services, to develop them and to grow our business).
To request and enable you to partake in a prize draw or competition.	Contact Identity Marketing Communications and Profile Usage	Consent
To administer and protect our business, the App and the Site,	Contact	Necessary for our legitimate interests (for running our business, for provision of

including: troubleshooting; data analysis; testing; system maintenance; support; reporting; and hosting of data.	Device Financial Identity Profile Technical Usage	administration and IT services, to ensure network security, to prevent fraud and in relation to a business reorganisation or group restructuring exercise).
To deliver relevant advertisements to you, including make suggestions and recommendations to you about goods and services that may be of interest to you.	Contact Identity Marketing and Communications Profile Technical Usage	Consent
To measure and understand the effectiveness of the advertising we send/serve to you.	Contact Device Identity Marketing and Communications Profile Technical Transaction Usage	Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to study and improve the App and the Site as well as our products and services, marketing and customer relationships and experiences.	Device Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To create aggregated user data.	Contact Device	Necessary for our legitimate interests (to study users (and their use) of the App and the Site in order develop our services and

	Identity Marketing and Communications Profile Technical Transaction Usage	grow our business).
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Where required or permitted by law, we may also process your personal data without your knowledge or consent.

5. Disclosures of your personal data

We will share your personal data with the third parties below for the purposes set out in the table above.

- External third parties set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

6. International transfers

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data in accordance with Art. 45(1) of the UK GDPR.

7. Data security

All information you provide to us is stored on our secure servers (or those of our third party service providers). Any payment transactions carried out by our chosen **third-party provider of payment processing services** will be encrypted.

Where you have chosen a password that enables you to access certain parts of the App and the Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breaches and – in the event of a personal data breach – will notify you and any applicable regulator when we are legally required to do so.

8. Data retention

In some circumstances, you can ask us to delete your data. See your legal rights for further information.

In the event that you do not use the App, the Site or the Services for two years or more, we will notify you that your personal data will be deleted unless you ask us not to do so.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- object to processing of your personal data;
- request restriction of processing your personal data;
- request transfer of your personal data;
- right to withdraw consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Description of categories of personal data

- **Contact Data:** billing address; delivery address; e-mail address; and telephone number(s).
- **Device Data:** includes: the type of device you use; unique device identifier(s) (for example, your device's IMEI number, the MAC address of your device's wireless network interface and/or the mobile phone number used by your device); network information; your device's operating system; and time zone setting.
- **Financial Data:** payment tokens; credit/debit card details.
- **Identity Data:** first name; last name; username or similar identifier; title; date of birth; and gender.
- **Marketing and Communications Data:** your preferences regarding: (a) receiving marketing from us; and (b) how we communicate with you.
- **Profile Data:** your username and password; purchases and orders made by you; your interests, physical details (e.g. build, height and hair colour), preferences, feedback and survey responses.
- **Technical Data:** internet protocol (IP) address; your login data; browser type and version; time zone setting and location; browser plug-in types and versions; operating system and platform; and other technology on the devices you use to access the App and the Site.

- **Transaction Data:** details about payments to and from you and about planned, attempted and successful deliveries as well as other details of products and services you have purchased from us.
- **Usage Data:** information about how you use the App, the Site and the Services.

11. Glossary

LAWFUL BASIS

- **'Consent'** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.
- **'Legitimate interest'** means the interest of our business or a third party. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **'Performance of contract'** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **'Complying with a legal obligation'** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

EXTERNAL THIRD PARTIES

- Amazon Web Services EMEA SARL (incorporated and registered in Luxembourg with company number B186284 and whose registered office is at 38, Avenue John F. Kennedy, L - 1855), a provider of cloud computing and storage services.
- Stripe Payments Europe, Limited (incorporated and registered in the Republic of Ireland with company number 513174 and whose registered office is at c/o A&L Goodbody, IFSC, North Wall Quay, Dublin 1, Dublin), a provider of payment services.
- Bagged2U Ltd t/a 'Tryd' (incorporated and registered in England and Wales with company number 11166212, whose registered office is at The Old Barn, Off Wood Street, Swanley Village, Kent, BR8 7PA), a provider of delivery services.

YOUR LEGAL RIGHTS

You have the right to:

- **request access** to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;

- **request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where:
 - you have successfully exercised your right to object to processing;
 - we may have processed your information unlawfully; or
 - we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you (if applicable) at the time of your request;

- **object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- **request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **request the transfer** of your personal data to you or to a third party. We will provide to you (or a third party you have chosen) your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- **withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.