

## Privacy & Cookies Policy

By entering into the Membership Agreement with Funkypigeon.com Limited ("**FP**"), you will become a Member of the My Funky Rewards programme ("My Funky Rewards Programme"). As a Member of the My Funky Rewards Programme FP grants you the right to participate in the My Funky Rewards Programme, which includes the right to earn cash-backs, purchase vouchers at a discount and to earn or receive other benefits. Collectively, the grant of the right to participate in the My Funky Rewards Programme and the right to earn and receive cash backs and other benefits is referred to as the My Funky Rewards Membership Service ("**My Funky Rewards Membership Service**").

**Please read this Privacy Policy carefully before joining the My Funky Rewards Programme or using this website.**

### Effective Date:

17/01/19

### Revision Date:

This Privacy Policy was last modified on 17/01/19

## 1 Purpose of this Privacy Policy

To become a member of My Funky Rewards, you must sign up online and agree to the **Terms of Service**. You also must be at least 18 years old and a resident of the United Kingdom. FP recognises the importance of protecting the personal data such as your full name, telephone number and e-mail and mailing address ("Personal Data") you provide to FP.

This Privacy Policy explains: (a) what sort of Personal Data FP collects; (b) how that Personal Data is used; (c) to whom FP may disclose your Personal Data; (d) how you can correct or change the Personal Data FP holds about you and (e) how you can change your preferences to opt-in or opt-out of receiving marketing communications.

This Privacy Policy is incorporated into, and forms part of, the Membership **Terms of Service**, which govern your participation in the My Funky Rewards Programme and your use of the My Funky Rewards Membership Service and this site <https://www.myfunkyrewards.com> ("**Website**").

If you have a concern about your data or a question about this Policy for our Data Protection Officer, please contact them by email at [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com).

FP is the data controller for this Website.

## 2 What Personal Data FP Collects and How it is Collected

FP collects and uses your Personal Data and data for the purposes of providing you with the My Funky Rewards Programme whilst ensuring you have a great and enjoyable experience.

It is up to you what Personal Data and data FP collect and you may decline to provide FP with it. However, if you choose not to provide FP with your Personal Data and data which is necessary to provide you with the My Funky Rewards Programme, you will not be able to use the My Funky Rewards Programme.

## Membership

To become a Member of the My Funky Rewards Programme, you will either be asked: to (a) provide a basic profile about yourself by filling out an online registration form with your name, mailing address, email address and payment information (including credit and/or debit card number and expiration date); or (b) expressly authorise a marketing partner of FP to transfer certain contact and billing information to FP (including your mailing address and payment information (including credit and/or debit card number and expiration date). This is necessary to authenticate your identity, register you to receive the relevant services including the day to day servicing of your membership and process your payment for the My Funky Rewards Programme. Without it, FP will not be able to sign you up and/or provide you access to the use the My Funky Rewards Programme. The data is also necessary to detect and if necessary withhold you from re-enrolling in the My Funky Rewards Programme where your membership was terminated due to a breach of terms and conditions such as misuse of the My Funky Rewards Programme or fraudulent activity. The specific legal ground we are processing your personal data on is under performance of a contract with you. FP processes such information in accordance with this Privacy Policy. The marketing partners of FP may have different privacy practices and you are encouraged to read their privacy policies.

After joining the My Funky Rewards Programme, FP may request that you verify your Personal Data previously provided, provide additional contact information (your telephone number, for instance), indicate your communication preferences and create your permanent member identification and password for secure use of the Website. You may also be required to select a challenge question and provide the answer so that FP can assist you if you forget your member identification or password. Any data requested helps FP to provide you with your benefits, and to personalise and properly service your Membership.

Depending on the benefits that you elect to use, you may be asked for additional information to properly service your Membership. For those benefits that require you to submit a reimbursement claim, you will be required to complete a form requesting information needed to process the claim. Depending on the type of claim and the circumstances surrounding the claim, you may be required to provide additional documentation to support your claim.

If you are invited to take part in the In-Store Offers pilot, you will be asked to provide payment card information in order to track and monitor your purchases in-store. Without this, you will not be able to use In-Store Offers.

### **Feedback and Surveys**

From time-to-time FP may provide you as a Member of the My Funky Rewards Programme the opportunity to participate in contests or surveys made available through the Website. If you participate, FP will request certain Personal Data from you. Participation in these surveys or contests is voluntary. This will be to improve the My Funky Rewards Programme and services for your continued enjoyment and to assist in the development of new services based on your feedback. The requested information typically includes contact information (such as name, email and/or mailing address) and demographic information. FP may use this information to publish contest winners, to monitor Website traffic or personalise the My Funky Rewards Membership Service (in the case of anonymous information collected in surveys) and to send participating Members an email newsletter. FP may use a third party service provider to conduct these surveys or contests; that company will be prohibited from using your Personal Data for any other purpose. FP will not share the Personal Data that you provide through a contest or survey with any other third parties unless you so consent or as otherwise provided in this Privacy Policy. The use of such third party service providers for surveys and contests will be made aware to you before you choose to participate.

### **Refer a Friend**

FP may offer a referral service so that FP can tell one of your friends about our My Funky Rewards Programme by forwarding certain marketing communications and/or emails to an individual you believe may be interested in joining the My Funky Rewards Programme.

### **Anonymised data and Aggregated data**

Anonymisation is the process of converting personal data to anonymised data so that it does not identify you or any individual and will not allow you or any individual to be identified through its combination with other data.

FP collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity.

In addition to the way FP process your data explained above, FP will use anonymised data and aggregated data to improve the quality of FP's existing products/services, develop new features, products/services and for overall research purposes.

An example would be where FP aggregate your data on how often you use the product/service to calculate the percentage of users accessing a specific website feature. As this data is anonymised and does not identify you, FP may share this data with FP's group companies as well as third parties and partners. However, if FP combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, FP treat the combined data as personal data which will be used in accordance with this privacy policy.

### **Profiling**

FP will use aggregated data, data from third party analytic providers such as Google Analytics (see section below), and the data FP collect about you through cookies including your online behaviour whilst using FP's services and your personal data to form a view on what FP think you may want or need, or what may be of interest to you. This is how FP decide which products, services and offers may be relevant for you. You will receive marketing communications from us about similar products and services if you have requested information from FP or purchased goods or services from FP or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing by clicking the unsubscribe link in the email or SMS. FP will also use this data to tailor your servicing communications.

## **3 How Personal Data is Used and Disclosed**

FP may share your data if it is necessary to do so in order to provide you with your product/service, if FP has a legitimate business purpose for doing so, or if you have given FP your explicit consent to do this.

Please note that when you are redirected to a partner or third party website from our website, if you provide personal data to any of those partners or third parties, your data will be governed by their privacy statement/policy. You should read their privacy statement/policy before you submit any of your data to their websites.

### **Usage**

FP only processes Personal Data for the purposes described in this Privacy Policy (including as set out in what personal identifiable information we collect and how it is collected section above and the Cookies and Logfiles section above) for the following purposes:

- to identify you as a Member of the My Funky Rewards Programme and to link your My Funky Rewards account with your main funkypigeon.com account;
- to provide the My Funky Rewards Membership Service and benefits that you request, and to communicate with you in that regard (including sending you emails related to the My Funky Rewards Membership Service and for billing purposes);
- to ensure the proper functioning of the Website;
- to meet research and product/service development needs and to improve the Website and the My Funky Rewards Membership Service; and
- to personalise your experience, including targeting the Website and the My Funky Rewards Membership Service to you.

### **Marketing Data from Third Parties**

FP may combine the information you submit under your account with other information made available to FP or third parties, including information FP receives from its marketing partners, and/or its benefits suppliers to better target the advertising and to improve the quality of the My Funky Rewards Membership Service.

### **User Communications**

When you communicate with FP (by telephone, email or otherwise), FP may record and/or retain those communications to be able to process enquiries, respond to your requests and improve the My Funky Rewards Membership Service. FP will process your data for legitimate business purposes namely quality assurance and training purposes and to ensure FP has collected and recorded any consent you provide over the phone. FP will always inform you if such recording or monitoring is taking place.

### **Where FP needs your consent**

FP will ask you for your express opt-in consent where we wish to send marketing communications to you, both about My Funky Rewards and Funkypigeon.com generally. We will ask you initially on your sign-up to the My Funky Rewards Programme and in relation to My Funky Rewards, you can update your preferences through the Website (see section 10 below for funkypigeon.com related preferences).

FP will ask you for your express opt-in consent before FP share your personal data with any company outside FP group companies for marketing purposes. FP will provide you with more information about the categories of these companies at the time of asking you for your express opt-in consent. This will typically be for products/services offered by other companies which may be of interest to you based on the product/service you have with us or may be for another purpose which will also be made clear to you at the time of obtaining your express opt-in consent.

If you provide your explicit opt-in consent to receive marketing communications, FP may provide you with further options where you can choose how to receive it, such as email, SMS, physical mail or telephone and the frequency of such marketing communications. If you have provided your explicit

consent to receive marketing communications but later change your mind, you can edit your preferences on how you receive them, how often you receive them or even stop receiving them altogether by contacting FP or updating your preferences in your member profile page.

## **Disclosure**

FP may disclose your Personal Data:

- to FP's group companies, suppliers and service providers, to enable FP to provide the My Funky Rewards Membership Service to you, including FP's benefit suppliers, to third parties who process payments to or from you on behalf of FP, hosting companies, content providers and software and/or hardware vendors who may have access to FP's databases.
- Specifically in relation to payment processing for payments by you, Personal Data will be disclosed to:
  - our third party bill payment firm who will bill you for your membership fees, on behalf of FP; and
  - First Data Europe Limited, and their group companies (together "First Data"), who together are the payment processor used by our third party bill payment firm to process your payments made to FP. First Data a) act as a data controller over Personal Data collected from you to process payments, and b) will use your Personal Data in accordance with the privacy policy at [REDACTED].

FP requires that its marketing partners and suppliers agree to process your Personal Data in accordance with instructions from FP, this Privacy Policy and any other appropriate confidentiality and security measures. These types of third parties are not permitted to use your information for any secondary purposes except where as noted elsewhere in this policy, Personal Data is used by third parties in accordance with their own privacy policy .

FP may also disclose your Personal Data to government, regulatory and law enforcement agencies to the extent disclosure is required or authorised by law and otherwise as FP believes is necessary or appropriate to satisfy any law, regulation or other governmental request, to operate the Website properly, or to protect or defend the rights of FP or the rights or well-being of FP's employees, users or others and/or if you are involved (or are suspected of being involved) in any illegal activity (even without a subpoena, warrant or court order).

If you provide explicit consent (either when joining the My Funky Rewards Programme or via the communication preferences pages available through your Member profile area on the Website), FP will also share your Personal Data with its group companies so that FP and/or its group companies may send you information about other products and services which are not similar to the product and service you already have and which FP considers to be of interest to you.

If you provide explicit consent (either when joining the My Funky Rewards Programme or via the communication preferences pages available through your Member profile area on the Website), FP may also share your Personal Data with third parties (who are not group companies) so that FP and/or those third parties may send you information about any products and services considered to be of interest to you. Note that third parties may have different privacy practices and FP encourages you to read their privacy policies.

FP may transfer your information to third parties as a result of or in connection with a sale, merger,

consolidation, transfer of assets, reorganisation or liquidation, and FP shall notify you of any such activity if your Personal Data becomes subject to a different privacy policy.

FP may disclose certain information about you such as first name, first initial of last name and city/town of residence publicly as an example of representative savings and/or to identify you as a Member of the My Funky Rewards Programme.

As part of the Service, we may use the services of financial institutions or bank's subcontractors, subject to legal reporting requirements. In such circumstances these financial institutions or bank's subcontractors may carry out identity checks before any financial transaction is processed. Any information, which is processed by way of transfer to said financial institutions or bank's subcontractors, is intended for their use only and for this specified purpose only.

As a result, we may ask you to provide us with a copy of your proof of identity (ID/passport) as well as some additional information such as a bank statement, date and place of birth, address and phone number.

We inform you that your failure or refusal to provide the information requested will prevent us from providing the benefits of the membership and may result in the termination of your membership. There may also be some delay to us commencing delivering of your benefits to you as a result of these checks.

## **4 Cookies**

This website uses cookies and similar technologies to distinguish you from other users of this Website. This helps FP provide you with a good experience when you browse this Website and also allows FP to improve the Website. In the following sections, FP will explain to you which cookies (and other similar technologies) are used on this Website (and for what purpose). By continuing to browse on this Website, you are agreeing to the use of cookies as set out below. If you do not agree to any or all of the terms below, FP invite you to stop browsing on this Website.

### **What is a Cookie?**

Cookies are text files containing small amounts of information which are downloaded by your internet browser and stored on your computer or other device when you visit the Website if you agree.

### **What are Cookies for?**

The use of cookies on the Website allows FP to optimise your browsing experience. FP are able to personalise offers they provide to you and use measurement techniques on the Website to understand what pages have been viewed, the type of activity users engage in on a specific webpage and how often they visit a certain webpage. The use of cookies also allows FP to easily provide you with your Cashback Rewards.

### **What Cookies do FP use?**

FP use the following cookies:

- a. **Strictly necessary cookies.** These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, automatically see your cashback rewards and take advantage of the main features of the FP Programme. Without these cookies, you could continue to browse the Website but would not fully enjoy all of its features. These cookies are:

Name	Purpose	Duration
BID	Uniquely identifies members who navigate on our Website from their browser	Permanent (until removed by Member)
PID	Defines the lists of retailers a Member of the FP Programme can access	
LV	Used for viewing preferences of a Member	
SESSION	For verification of the validity of a Member session on our Website	Duration of the session
ASP.NET_SESSION id session		
ASPSESSIONIDSQRCRRSB SESSION		

WLSESSION		
JOIN EMAIL SENT	For verification of sending a join confirmation email to a new Member	1 year
COOKIECONSENT	Used to avoid repetitively asking a user for their consent to use cookies on the website when they have already agreed.	
ASPXAUTH	Used to determine if a user is authenticated.	Duration of the session
FP_MSG_CODE	Used to enhance the browsing experience of the Website	1 year
CS_WIDGET		

- b. **Analytical/performance cookies.** These allow FP to recognise and count the number of visitors and to see how visitors move around on the Website when they are using it. This helps to improve the way the Website works, for example, by ensuring that users are finding what they are looking for easily. Refusal of these cookies does not affect your use of the Website. These cookies are mainly third party cookies such as Google's:

Name	Purpose	More Information
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<p>_ga ; _gid ; _gat ; AMP_TOKEN ; _gac_&lt;property-id&gt; ; _utma ; _utmb ; _utmt ; _utmc ; _utmz ; _utmv ; _utm ; _utmxx ; _gaexp.</p>	<p>To collect information about how users use our Website. The information is collected anonymously and is used in reports that are solely for the purpose of improving our website.</p>	<p>We use Google Analytics to provide these cookies. For more information, please review this privacy policy and Google’s privacy policy: <a href="http://www.google.co.uk/intl/en/analytics/privacyoverview.html">http://www.google.co.uk/intl/en/analytics/privacyoverview.html</a></p> <p>For more information on the purpose and duration of Google Analytic cookies, please visit: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a></p> <p>To disable Google Analytic cookies, please visit: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a></p>
<p>WRUID CT_DATA CT_RS</p>	<p>Used to anonymously collect information on how to navigate users on our Website to improve functionality and</p>	<p>Clicktale: For more details on these cookies and their duration, please visit: <a href="http://www.clicktale.com/privacy_service.aspx">http://www.clicktale.com/privacy_service.aspx</a> (See Section 8 below)</p>

	offer an optimised customer experience.	
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- c. **Functionality cookies.** These are used to recognise you when you return to the website. This enables FP to personalise content for you, greet you by your name and remember your preferences.

Name	Purpose	Duration
USER ID	To tell us if a user is already a member of our service.	Permanent (until removed by Member)

- d. **Targeting cookies.** These cookies record your visit to the Website, the pages you have visited and the links you have followed. Currently, FP do not use targeting cookies and if FP do, FP will provide you with a list of such cookies. Targeting cookies would be used to make the Website and the advertising displayed on it more relevant to your interests.

### Can I decline cookies?

Yes, you can easily refuse one or even all cookies. Please remember that by refusing cookies you may still use the Website but you may not be able to access all of the Websites functionality and your access may be limited particularly if you decline the use of strictly necessary cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our site.

To learn more, please follow the directions provided in your internet browser's "help" file or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). FP has also provided you above with the relevant links which explain how to delete third party cookies that are used.

### Third party cookies

FP may also use cookies to enable the use of advertising technology to serve you advertisements that may be relevant to you when you visit search engines, the Website and/or third party websites upon which FP advertise.

This technology uses information about your previous visits to the Website and the third party websites upon which FP advertise to tailor advertising to you. In the course of serving these advertisements, a unique third-party cookie may be placed or recognised on your browser to enable FP to recognise you.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which FP has no control. These cookies are likely to be analytical/performance cookies or targeting cookies. Please see the sections above to understand what third party cookies are used.

### **Web beacons**

FP uses web beacons, provided by FP's ad serving partner, to help manage the inline advertising of FP. These web beacons allow FP and/or FP's ad serving partner to access individual cookies when a browser visits the Website. This allows FP to identify which advertisements or listings served by FP's ad serving partner bring users to the Website.

Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of the users of the Website. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on the Website and are about the size of the period at the end of this sentence.

### **Logfiles**

Like many websites, FP gathers certain information relating to use of the Website automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), return/exit pages, operating system, date/time stamp and clickstream data. FP uses this information, which does not by itself identify individual users, to analyse trends, to administer the Website, to track users' movements around the Website and to gather demographic information about the user base as a whole.

### **Customer experience analytics services**

In order to analyse the behaviour of the visitors in the Website, FP are likely to use some customer experience analytic services. Through this technology, FP do not collect or transfer any personal identifiable information, using them only to record, on a completely anonymous basis, information such as mouse clicks, mouse movements, scrolling activity as well as non-Personal Data text you type whilst on this website.

FP are, for instance, using at the moment the ClickTale customer experience analytics service. ClickTale does not create a user profile for the purpose of tracking a user across unrelated web sites and will only use such information pursuant to its Privacy Policy (located at [http://www.clicktale.com/privacy\\_service.aspx](http://www.clicktale.com/privacy_service.aspx)). You can choose to disable the ClickTale service at <http://www.clicktale.net/disable.html>.

### **5 Links to Third Party Sites**

The Website may contain links or references to third party websites and the privacy policies of these websites may differ from this Privacy Policy. Please be aware that FP has no control over such

websites (other than those controlled by FP's group companies) and this Privacy Policy does not apply to such websites. We encourage you to read the privacy policies of such websites.

## **6 Download Application**

In certain cases you may be presented with the opportunity to download software from FP or its licensors and suppliers that may improve the My Funky Rewards Membership Services and the My Funky Rewards Programme. In such cases, you will be presented with, and required to agree to separate terms and conditions specifically related to the download application ("Download Application") prior to downloading the software.

Although acceptance of the Download Application Privacy Policy is required to utilise a specific part of the My Funky Rewards Programme, the right to receive most benefits as included in the My Funky Rewards Membership can still be accessed by logging onto the Member's Only area of the Website.

At any time you can stop your use of this Download Application by uninstalling the Download Application from your computer. The only authorised means to uninstall the software is to use the Add/Remove programmes facility in the Microsoft Windows Control Panel. After the removal of the Download Application, you will no longer be able to use the features of this Download Application.

## **7 How FP Protects the Security of Personal Data**

The security of your Personal Data is an important concern to FP. All customer databases are held in a secure environment and (except for law enforcement authorities in limited circumstances), only those FP employees or other persons who need access to your data in order to perform their duties are allowed such access. Any of these employees or persons who violate FP privacy and/or security policies may be subject to disciplinary action, including possible termination and civil and/or criminal prosecution. Where you are using FP websites, FP take proactive steps to put safeguards in place to provide for the secure transmission of your data from your computer to FP servers. However, due to the inherent open nature of the Internet, FP cannot guarantee that communications between you and FP, and FP and you, will be free from unauthorised access by third parties, such as hackers. FP has implemented all necessary and reasonable technical and organisational measures to protect your data including:

- data minimisation and encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In addition, for any Personal Data you submit to FP through the Website, such Personal Data shall be transmitted to FP using Secure Socket Layer encryption. You agree not to hold FP responsible for any breach of security except as set out in the Membership Terms of Service. In addition, unencrypted e-mail is not a "secure" means of communicating with FP, since e-mail may be intercepted by a third party in the course of its delivery.

You are responsible for maintaining the strict confidentiality of your Membership password, and you shall be responsible for any access to or use of the Website or the My Funky Rewards Membership Service by you or any person or entity using a password provided to you, whether or not such access or use has been authorised by or on behalf of you, and whether or not such person or entity is your employee, relative or agent. You agree to (a) immediately notify FP of any unauthorised use of your password, membership number, or any other breach of security, and (b) ensure that you exit from your account at the end of each session. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account and membership number, and notify FP when you desire to cancel your Membership.

## **8 Transfer of Personal Data outside the EEA**

As part of the services offered to you, for example through our website, the Personal Data you provide to FP will be transferred to and processed in countries outside of the European Economic Area (EEA) in particular:

- to the US for the purposes of providing you services, and payment processing
- Switzerland for the purposes of providing you services;
- Philippines for the purpose of providing customer service; and
- Ireland for hosting.

Whenever FP transfer or store your personal data outside of EEA, FP will take steps to ensure that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the EU General Data Protection Regulation, using one or more of the mechanisms outlined below:

- FP may process or transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (to see the list, please visit: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)).
- FP may process or transfer your Personal Data to the US when FP's affiliate or provider is Privacy Shield certified (<https://www.privacyshield.gov>). Any entity that is Privacy Shield certified commits to ensure that any processing of your data is in accordance with the Privacy Shield principles, namely : Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access and Recourse; and Enforcement and Liability.
- When providers or affiliates based in other countries that have not been deemed to provide an adequate level of protection for personal data by the European Commission process your data, FP may rely on other approved grounds to transfer your Personal Data, including incorporating the EU Commission's standard contractual clauses into relevant contracts, and through relying on provider's adoption of binding corporate rules.

You can contact FP's Data Protection Officer if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **9 Children's Privacy**

Protecting the privacy of children is very important to FP. Membership of the My Funky Rewards Programme is not open to anyone under 18 years of age.

## **10 How to Update Your Information**

FP takes reasonable steps to ensure that the Personal Data it collects and processes is accurate, complete and current, but FP depends on its Members to correct or keep up to date their Personal Data. When returning to your Member Profile Maintenance section, you can review and update your Personal Data. You may also change your password, but you will need to confirm your identity first. Any change to your "Member Profile" on the Website will be recapped in an e-mail that is automatically sent out by FP to the e-mail address on file in your Member Profile.

Please be aware that if you want to update your preferences in relation to marketing communication relating to Funkypigeon.com generally (and not just My Funky Rewards), you will need to visit the member section on <https://www.funkypigeon.com> or contact [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com) as you will not be able to update these preferences on the Website.

## **11 Your rights**

### **Rectification**

You can update and amend your data held by FP if inaccurate or incomplete by emailing FP at [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com), writing to My Funky Rewards, Sentinel House – Airspeed Road, Portsmouth, Hampshire P03 5RF, calling us (please visit the Contact Us section on our website to always ensure you have our up to date number) or visiting your profile page if you have an online account.

### **Access, restriction of processing and erasure**

If you would like to see the data FP process on you, restrict the processing of your data or have it deleted you can contact FP's Data Protection Officer who will investigate the matter and take you through the necessary steps to provide you with the data you requested or to delete it. If you would like it deleted, in particular any data which is necessary for FP to process to provide you with the product/service, you will no longer be able to use the product/service. If applicable, FP's Data Protection Officer will explain any circumstances where FP are not be able to erase your data such as the exercise or defence of a legal claim and situations where you can restrict the processing of your data. FP's Data Protection Officer will respond to your query within 30 days of receiving your request.

### **Object**

You can make choices about how your Personal Data may be shared by FP with third parties for marketing purposes and/or how your Personal Data may be used by FP for purposes not related to your Membership. FP enables Members to opt in to email marketing and to opt in to marketing from third parties by modifying their online profile. A link to this profile will be available in marketing emails. If you have provided FP with your explicit consent to receive marketing communications via email, you will normally find an unsubscribe link at the bottom of the marketing emails you receive or you can also unsubscribe to email marketing by sending an email to [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com) with "opt out" in the subject line. If you elect to opt out, such election (a) will not apply to communications that are directly related to your Membership, the My Funky Rewards Membership Service and the benefits and/or the fulfilment of a specific transaction you have requested (for example, a claim submitted for a specific benefit and/or emails describing the benefits of the My Funky Rewards Membership Service or special Member offers; (b) shall not preclude FP, including its employees, contractors, agents and other representatives, from accessing

and viewing your Personal Data to provide benefits, to provide support and for any other purpose relating to your Membership of the My Funky Rewards Programme and (c) shall not preclude FP from disclosing your Personal Data as described in this Privacy Policy for purposes other than sending you promotional and marketing materials not related to your Membership.

## **12 Retention**

FP retain your data for as long as you continue to use the product/service for the purposes explained in Section 2 and 3 above. When you cease your membership of the product/service, we will retain your data for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices you have made such as to receive marketing communications that you provided your consent to. In particular, we will retain call recordings, the data you supplied when joining the product, including complaints, claims and any other data you supplied during the duration of your contract with us for your product/service for a period of 10 years from termination or expiry of your service in line with industry standards and applicable legal requirements.

## **13 Compliance Issues and Liability**

FP has appointed a Data Protection Officer responsible for privacy matters. If you believe your Personal Data has been used in a way that is not consistent with this Privacy Policy or your specified preferences, or if you have further questions related to this policy, please contact the Data Protection Officer by email at [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com). If you are not happy with the response you received or believe your data has not been used in accordance with this policy and therefore not processed in line with applicable laws, you may lodge a complaint with the Information Commissioner's Office (ICO), the UK Supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

FP shall assume responsibility for the Data that You submit if FP fails to honour its duty to provide reasonable protection of your personal information. It should be borne in mind, however, that you cannot hold FP accountable for a security violation unless if FP is at fault, in which case FP's liability shall be subject to the limits as set out in the Membership Terms of Service.

## **14 Changes to this Privacy Policy**

FP reserves the right to modify this Privacy Policy at any time, so please review it frequently on the Website. If FP makes any changes, you will either be notified by email or FP will post a notice on the Website's homepage. FP will also summarise any material changes to the Privacy Policy on the Website. FP encourages you to read any revised Privacy Policy.

If FP is going to use your personal information in a manner different from that stated at the time of collection, you will be notified via email, and you will have a choice as to whether or not FP uses your personal information in this different manner.

## **15 Acceptance of this Privacy Policy**

By using the Website and/or using the My Funky Rewards Membership Service, you signify your acceptance of this Privacy Policy.

This is the FP privacy policy (the "Privacy Policy") which discloses the privacy practices for the My Funky Rewards Programme and the My Funky Rewards Membership Service and the myfunkyrewards.com Website") (which may be amended from time to time in accordance with the Changes to this Privacy Policy section below). The My Funky Rewards Membership Service and Website are owned and operated by FP. FP is a limited company registered in England & Wales, with registered number 06208854, and its registered office is at Greenbridge Road, Swindon, Wiltshire, SN3 3RX.If you have any questions about this Privacy Policy, please feel free to contact FP at [customerservice@funkypigeon.com](mailto:customerservice@funkypigeon.com) or write to FP at Funky Pigeon, County Gates, Ashton Road, Bristol, BS3 2JH