

## DICKIES AMBASSADORS WEBSITE PRIVACY POLICY

### About us

The website <https://www.dickiesambassadors.co.uk> (**this site**) is operated by Williamson-Dickie Europe Limited.

References in this Privacy Policy to “Dickies”, “WD”, “we”, “us” and “our” are to Williamson-Dickie Europe Limited.

This site hosts the free-to-use "Dickies Ambassadors" community. Through this site and the community of members, we conduct market research to improve our products and offerings and offer members of the community exclusive information about our products, including product samples from time to time. This Privacy Policy is designed to give you information about how we obtain and process your personal data in connection with your use of this site.

This Privacy Policy is aimed at members of the Dickies Ambassadors community (“members”/“you”) and is intended to provide you with information about how we obtain and process your personal data in connection with your use of this site.

We are responsible for deciding how we hold and use personal information about you. We are committed to protecting and respecting your privacy and ensuring that personal and sensitive information is gathered in compliance with this Privacy Policy.

We may collect, use, store and transfer different kinds of personal data about you when you use this site, including when you sign up to become a member and when you respond to customer surveys.

Please read this Privacy Policy carefully, together with our [Cookies Policy](#). If you use our Dickies Workwear website (<https://www.dickiesworkwear.com/uk>) to browse our product range and/or purchase goods, please also refer to our Dickies Workwear Privacy Policy <https://www.dickiesworkwear.com/uk/info/privacy-policy> and Terms and Conditions of Sale <https://www.dickiesworkwear.com/uk/info/terms-and-conditions>. From time to time we may also issue other privacy or fair processing notices to you relating to the way in which we collect personal data about you which we will bring to your attention.

### How to contact us

Williamson-Dickie Europe Limited is the “data controller” in respect of your personal data for the purposes of data protection legislation. Williamson-Dickie Europe Limited is a limited company registered in England and Wales under company number 1757853. Our registered office is at Second Avenue, Westfield Trading Estate, Midsomer Norton, Radstock BA3 4BH United Kingdom.

If you have any questions or concerns about any information contained within our Privacy Policy, please email us at [dickiesukmarketing@vfc.com](mailto:dickiesukmarketing@vfc.com).

### The data we collect about you

Personal data means any information relating to an identifiable individual. It does not include any data or information which relates to a person that cannot be identified or where the person's identity has been removed (i.e. anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** – data which identifies you, including your name, age, date of birth, username (email address) and gender
- **Contact data** – your contact details, including your email address, region in which you live, postal address and postcode
- **Employment data** – your employment status and type of occupation

- **Shopping data** – information about how you acquire your work clothing
- **Profile data** – information we store in connection with your registration as a member, including your username (email address) and password, account preferences, reviews of products, feedback and survey responses
- **Survey data** – information you provide in response to surveys or other requests for information we may send you from time to time, including your individual answers, product reviews and other feedback
- **Communications data** – information contained in communications between us, including email correspondence asking you to respond to a survey we have posted on this site
- **Usage data** – information about how you use this site, including how you navigate this site and if you encounter any problems
- **Technical data** – electronic information which is automatically logged/stored by processing equipment and which we may collect from time to time, including details of the device(s) you use to access our services, 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 this site

We may **anonymise** some of your personal data so that it can no longer be linked to you. We are most likely to do this with your Survey data. We may then **aggregate** that data with other information we hold to help inform us how the Dickies Ambassadors community as a whole views our products and our brand.

Anonymised and aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Identity data, Contact data, Employment data, Shopping data, Profile data and Survey data for research and statistical purposes in order to improve our business strategy and our products and services. However, if we combine or connect anonymised or aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used 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, or genetic or biometric data). Nor do we collect any information about criminal convictions and offences.

## How we collect information

**Direct interactions:** The majority of the personal data we hold about you is collected when you interact with us or correspond with us directly (via this site, by email or otherwise). This includes personal data you provide when you:

- Sign up to become a member
- Participate on this site, such as by posting a review or engaging with other members
- Send us an email
- Respond to a survey on this site

**Automated technologies or interactions:** When you interact with this site, our systems may automatically collect information about your equipment, browsing actions and patterns. We are able to collect this personal data (namely Technical data and Usage data) by using cookies, server logs and other similar technologies. Please see our [Cookies Policy](#) and the 'Cookies' section below for more information.

**Third parties:** We engage a third party market research company (currently Vision Critical) to assist us with the operation of this site and to conduct market research on our behalf. From time to time, Vision Critical may obtain personal data on our behalf and share it with us in connection with the

Dickies Ambassadors community. Vision Critical are our data processor and are not entitled to use your personal data for their own purposes or outside the scope of our instructions.

## How and why we use your personal data

We will only collect and process your personal data where we have a legal basis to do so. This legal basis will vary depending on the manner and purpose for which we are collecting your personal data.

The purposes for which we will use your personal data are as follows:

- 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 (please see below)
- Where we have your **consent** to do so, in particular where you subscribe to become a member you will be doing so voluntarily and may unsubscribe at any time. We shall collect your Identity data, Contact data, Employment data and Shopping data as part of the subscription process when you subscribe to this site. You may withdraw your consent at any time and cease to be a member of the Ambassadors community by informing us by email or via this site (please see the 'Your Rights' section below). In respect of your Survey data, it is your choice whether or not to provide this information. If you do provide Survey data and later decide you wish to withdraw your consent to us using it, we will anonymise this Survey data so that it can no longer be attributed to you

Our legitimate interests in processing your personal data for our own business purposes include the following. Please contact us at any time if you require further information on the precise legitimate interests we are relying on to process your personal data in a particular way:

- to set up and manage access to member accounts for this site (which may include processing Identity data, Contact data and Profile data)
- to target our market research surveys to specific members and to those likely to provide the most relevant feedback (which may include processing Identity data, Contact data, Employment data, Shopping data, Profile data and Survey data)
- to analyse customer trends and improve our business, products and services (which may include processing Identity data, Contact data, Employment data, Shopping data, Profile data and Survey data)
- to respond to enquiries submitted to us by our members (which may include processing Identity data, Contact data and Communications data)
- to send you sample products for testing or review (which may include processing Identity data, Contact data and Communications data)
- to administer and protect our business, this site and our online store (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) (which may include processing Technical data and Usage data)
- to use data analytics to improve this site, our services, marketing, customer relationships and experiences (which may include processing Technical data and Usage data)
- to deliver relevant website content and advertisements to you, and to measure or understand the effectiveness of such advertising by monitoring or tracking responses and engagement (which may include processing Technical data and Usage data)
- to manage our relationship with members, including responding to enquiries or complaints and notifying members of changes to our terms and conditions or this Privacy Policy (which may include processing Identity data, Contact data, Profile data and Communications data)

You have the right to object to the above processing conducted for our legitimate interests, in which case we would assess your complaint and determine whether or not we are still entitled to continue the processing and whether any additional safeguards are required.

We may also process your personal data to fulfil our legal, regulatory and risk management obligations, including for the purpose of establishing, exercising or defending legal claims. The type of personal data we need to retain and process on these grounds will vary, but could realistically include any of the personal data listed above.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you require further detail about the specific legal ground we are relying on to process your personal data.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to process your personal data for this new purpose.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **How we protect your personal data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the personal data you provide to us is only available to our authorised personnel and contractors who need access to it in order to fulfil their duties. They will only process your personal data on our instructions and they shall be subject to a duty of confidentiality.

Although we will do our best to protect your personal data, the transmission of information via the internet is not completely secure, therefore we cannot guarantee the security of any personal data transmitted to this site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Once we no longer require your personal data, we will take reasonable steps to destroy it in a secure manner.

## **How long we hold your personal data for**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. This will generally be for so long as you remain a member of the Dickies Ambassadors community.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Our retention periods take into account legal and regulatory requirements and are subject to change. If you have any questions in this regard, please contact us using the contact details set out in this Privacy Policy.

If you cease to be a member of the Dickies Ambassadors community, we shall anonymise your personal data, in particular your Survey data so that it can no longer be linked to you. We may also do this at any other time as a matter of good practice and to limit the amount of personal data we hold about you. Anonymised data is not personal data (provided it is truly anonymised) and therefore we

have the right to continue using this data even if you have withdrawn your consent to being a member of the site or you have challenged any of the legitimate purposes for which we process your personal data. We use anonymised survey responses in order to develop our business methods and strategy, and for research and statistical purposes. We may use this anonymised data indefinitely without further notice to you.

We shall not have any liability whatsoever to you for the deletion of personal data in accordance with our data retention policy.

## **Cookies**

This site uses cookies for a number of purposes, for instance to enable you to log into secure areas of this site and to respond to surveys and to allow us to analyse data about web page traffic, build a demographic profile and improve this site in order to tailor it to members' needs. Overall, cookies help us make your experience more efficient and enjoyable when you browse this site, and also allow us to improve our content and services. You can find out more about the way cookies work on [www.cookiecentral.com](http://www.cookiecentral.com) and [www.allaboutcookies.org](http://www.allaboutcookies.org).

For more information about the cookies we use and the reasons why we use them, please see our [Cookies Policy](#).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies (and the above websites tell you how to do this). If you disable or refuse all cookies, please note that some parts of this site may become inaccessible or will not function properly.

## **Sharing your personal information with third parties**

We may share your personal data with third parties where required by law or where we have another legitimate interest in doing so. We do not sell your personal data to third parties.

We may share your personal data with third parties who provide services to us, including our IT and software provider and our market research provider (currently Vision Critical).

We may also share your personal data with the following third parties:

- Third parties to whom we may choose to sell, transfer or merge parts of our business or 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
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accountancy services
- Our group companies, including for the purposes of our regular reporting activities on company performance, to feedback the results of our market research within the group, to operate and improve our business, for system maintenance support and hosting of data and/or in the context of a business reorganisation or group restructuring exercise
- Other companies and organisations for the purposes of fraud protection and credit risk reduction, HM Revenue & Customs, the police, regulators and other authorities and public bodies where we are required to do so by law.

To the extent we share data with third party data processors, we require all such data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions as set out in our data processing agreements.

In some instances where we share data with third parties, such as public bodies, those third parties will also be controllers of your data. We shall not be responsible or liable for the way in which other data controllers hold or process your personal data. Please contact those third parties for further information regarding how they will use your data. We shall only share your personal data with third parties in accordance with this Privacy Policy.

## International transfers

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”).

Whenever we transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#)
- In some instances, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#)
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EEA and the US. For further details, see [European Commission: EU-US Privacy Shield](#)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

## Your rights

You have the following rights in respect of the personal data that we process about you (where we determine the purpose and means for which that personal data shall be processed):

- The right to request **access** to your personal data that we hold and to receive certain information relating to that data (commonly known as a "data subject access request")
- The right to ask us to **rectify** inaccurate data or to complete incomplete data (though we may need to verify the accuracy of the new data you provide to us)
- A right to receive or ask for your personal data to be **transferred** to a third party in a structured, commonly used and 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)
- The right to request the **erasure** of personal data if it is no longer necessary in relation to the purposes for which it was collected or processed or if you have successfully objected to processing (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)
- The right to **object** to how we process your personal data in certain circumstances, including the right to ask us not to process your personal data for marketing purposes

- The right to **restrict** processing of your personal data, for example if you want us to establish the accuracy of the data or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Where we are processing personal data relating to you on the basis that we have your consent to do so, you may **withdraw** your consent at any time (this will not affect the lawfulness of any processing carried out before you withdraw your consent). If you withdraw your consent, you will cease to become a member of the Ambassadors community. We may continue to use any personal data you have provided prior to this time, in particular Survey data, provided that we truly anonymise this data so that it can no longer be linked to you

If you wish to exercise any of the rights set out above in respect of your personal data, please contact us by email at [dickiesukmarketing@vfc.com](mailto:dickiesukmarketing@vfc.com).

We may ask you to verify your identity if you make a request to us to exercise any of the rights set out above. 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.

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 may refuse to comply with your request in these circumstances.

We will try to respond to all legitimate requests within one month. Occasionally, it may 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.

## **How to complain**

Please let us know if you are unhappy with how we have used your personal information. You may contact us by email at [dickiesukmarketing@vfc.com](mailto:dickiesukmarketing@vfc.com).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance and we shall endeavour to resolve your complaint.

## **Changes to your data**

Please let us know if you change your contact details. You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us if you want to do this.

## **Changes to this Privacy Policy**

This Privacy Policy was last updated in March 2019. This Privacy Policy may change from time to time. We will regularly review this Privacy Policy and any updates we make will be posted on this site. We encourage you to frequently check this page for any changes to stay informed about how we are collecting and processing personal information about you.