

Privacy & Cookies: Our promises

We'll always keep your data safe and secure. So you're clued up, here's why we need it and how we use it.

Protecting Your Privacy

At ASOS, we are 100% committed to protecting your privacy and security. We are customers ourselves of ASOS, so we totally appreciate and respect how important privacy is.

For ASOS Front Row the data controller — the company that's responsible for protecting your privacy— is ASOS.com Limited.

ASOS Front Row is a community where you can share your views on matters that may influence the way we operator and goods and services we offer.

How we use your information

We use your information in a number of different ways — what we do depends on the information. The tables below set this out in detail, showing what we do, and why we do it.

We **collect information from you** which may include your name, address, e-mail address, your phone number, images and any other information or opinions you choose to share with us.

You provide this information at different times, for example:

- at the time of registering to use the Community;
- by participating in surveys, polls or online discussions;

- participating in video recordings;
- by posting material in the Community;
- by submitting enquiries using the contact details posted in the Community;
- by asking us to update any out of date information which we may hold about you; and
- by participating in any other community activity.

Your Personal Details

| What we do | Why we do it | Why we need to do it (the legal stuff!) |
|---|---|---|
| Manage your involvement in Front Row | Once you join our community, we need to administrate the scheme and manage your involvement | Once you join, it's an important part of our contract commitment to you |
| Send you updates, such as updates to our Terms and Conditions | To keep you informed of any changes to ASOS services | Legally, we have to do this, it's an important part of our contract commitment to you, and it's also important for us to keep you updated |
| Provide support if you have any questions | After all, you expect the best service from us! | It's an important part of our service and also part of our contract commitment to you |
| Improve the services and support we provide to you | So that you get the best possible service when you contact us | It is important for us to train our staff |

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| Send you invites to surveys or competitions | So that you can take part in FROW activities | It's up to you whether you take part |
| Manage the competitions that you choose to enter and get prizes to the winners. | We need to let you know if you win! | If you take part we will treat this as an important contract commitment to you. |

Information about your phone or laptop, and how you use our website and app

Information collected when you browse our site or use our app, including your IP address and device type, how you use our website and app (such as the pages you visit) and, if you choose to share it with us, your location data.

| What we do | Why we do it | Why we need to do it (the legal stuff!) |
|---|--|---|
| Identify you when you visit our Front Row website or contact us | Checking your identity helps us to keep your information safe from fraudsters | Legally, we have to do this and it is also important for us |
| Improve our website and set default options for you (such as language and currency) | It's important for us, and it's much easier for you, if we know the language and currency you prefer, and it also helps us to protect your information | It is important for us to know what you like to give you the best shopping experience |
| Monitor visitors to our Front Row website and analyse their behaviour | To protect our website and to help make our service better | This is important for us and legally, we have to do this! |

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| We use our information and public sources of information to help us investigate fraudulent activity | To prevent and detect fraud against either you or ASOS – unfortunate, but absolutely essential | This is important for us to protect our service, to protect you and to stop this |
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If you post comments about ASOS, tag ASOS or photos to our us or on Social Media pages or take part in video recordings

| What we do | Why we do it | Why we need to do it (the legal stuff!) |
|---|---|---|
| Monitor your views or opinions | We may want to respond to you or react, particularly if you are unhappy with something. | It is important for us to know what you think about us |
| Keep track of how many of your followers comment on your ASOS posts | We want to see how your followers feel about ASOS | Its in our business interest to understand how people feel about ASOS |

Your responses to surveys, feedback and competitions

| What we do | Why we do it | Why we need to do it (the legal stuff!) |
|--|--|--|
| We will ask for feedback on our products, how you feel we are doing or other topics where you views will be important. | Its an important aspect of our Front Row scheme to get your views. | It's up to you whether you take part. |

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| <p>Manage the competitions that you choose to enter and get prizes to the winners. We will let you know how we use your data at the point of entry.</p> | <p>We need to let you know if you win!</p> | <p>If you take part we will treat this as an important contract commitment to you.</p> |
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You don't have to give us all of this personal information but if you don't, you may not be able to fully benefit from being a member of the Front Row community. But that is your choice – and we respect that.

We also anonymise and aggregate personal information (so that it does not identify you) and use it for purposes including testing our IT systems, research, data analysis, improving our site and app, and developing new products and services.

Fraud prevention and detection

We use any of the above categories of information to identify, prevent and detect fraud, against either you or against ASOS. Detecting and preventing fraud is an unfortunate, but an absolutely essential part of our service and our contract commitment to you. Legally, we have to do this, and it is very important for us.

Personalising your Front Row ASOS experience

We use the data we collect to help us provide you with the best experience and develop services that we think you will love.

Sharing your Information

We do not, and will not, sell *any* of your personal data to *any* third party – including your name, address, email address or images. We want to earn and maintain your trust, and we believe this is absolutely essential in order to do that.

However, we share your data with the following categories of companies as an essential part of being able to provide our services to you:

- Companies in the ASOS group, as sometimes different bits of our group are responsible for different activities
- Professional service providers, such as website hosts, who help us run our business – such as Vision Critical, who help us run this community.
- Social Media sites and other companies approved by you

If you would like to know more about the 3rd parties we may share personal data with, or how to find out more on how they will use your data, please contact us at the details below.

We may also provide third parties with aggregated and anonymised information and analytics about our customers. Before we do so, we will make sure that it does not identify you.

Your Information and Countries outside Europe

ASOS is a global business with operations inside and outside of the United Kingdom and we use suppliers and fulfilment centres located across the world. Some of these locations will not offer the same level of protection for your personal data as the UK or the EU, but if we transfer your information to one of these locations we will take steps to ensure that your data and rights are protected through methods approved within the relevant Data Protection laws. Please contact us if you would like further information about how we protect your transferred information.

Keeping Your Information

We'll hold on to your information for as long as you continue to be an ASOS Front Row member and for as long as we are required to keep it to ensure we meet our legal requirements across the globe.

If you no longer wish to be a member you can contact us at the email address below and request that we remove you from our community. However, we have a legal requirement to keep some of your personal data even after you have asked us to delete it. We will only keep what we absolutely need to, and only to make sure we can meet our legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms & Conditions.

Your Rights

You have a lot of rights relating to your personal information, these are:

- The right to be informed about how your personal information is being used (like this notice!)
- The right to access the personal information we hold about you
- The right to request the correction of inaccurate personal information we hold about you
- The right to request that we delete your data, or stop processing it or collecting it, in some circumstances
- The right to stop direct marketing messages
- The right to withdraw consent for any consent-based processing at any time
- The right to request that we transfer or port elements of your data either to you or another service provider
- The right to ask us to explain any computer-system decision about you
- The right to complain to your data protection regulator — in the UK, the Information Commissioner's Office

If you want to exercise your rights, have a complaint, or just have questions, please contact us. As a starting point, we have 30 days in which to respond to you. Our contact details are at the end of this Policy.

Changes to how we protect your privacy

We may change this page from time to time, to reflect how we are processing your data.

If we make significant changes, we will make that clear on the ASOS website or other ASOS services, or by some other means of contact such as email, so that you are able to review the changes before you continue to use ASOS.

Cookies

We use cookies on our website. For more information on cookies, please see our suppliers Cookie Policy

<http://webhelp.vccommunities.com/enus/index.html#Cookies%20and%20tracking%20pixels>.

How to contact us

We always want to hear from our customers (especially if you feel we've let you down or could do better).

If you:

- Have any questions or feedback about this notice
- Would like us to stop using your information
- Want to exercise any of your rights as set out above, or have a complaint
- Please don't hesitate to contact the support team at Vision Critical, who will be happy to answer any questions you may have.
 - UK: support@asosfrontrow-uk.vision-critical.com
 - US: support@asosfrontrow-us.vision-critical.com

You can also contact our privacy team by dropping us a line at dataprotection@asos.com or if you'd like to, you can write to us at:

ASOS Data Protection officer
Greater London House
Hampstead Road
London
NW17FB
UK

ASOS Data Protection Officer
An der Anhalter Bahn 6
14979 Grossbeeren
Germany