



# Privacy Policy

Last updated: 26/07/2021

Social Buff Limited (registered number 11559804), whose registered office is at 22 Wenlock Road N1 7GU, knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy and forms part of our website terms and conditions ('Website Terms').

By accepting our Website Terms or by visiting [socialbuff.com](https://socialbuff.com) ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.

The Website is brought to you by Socialbuff Limited. Socialbuff Limited believes it is important to protect your Personal Data (General Data Protection Regulation and the Data Protection Act 2018) and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data and tells you certain things we will do and not do. You should read this policy in conjunction with the Website Terms.

When we first obtain Personal Data from you, or when you take a new service or product from us, we will give you the opportunity to tell us if you do or do not want to receive information from us about other services or products (as applicable). You can normally do this by ticking a box on an application form or contract. You may change your mind at any time by emailing us at the address below.

Some of the Personal Data we hold about you may be 'sensitive personal data' within the meaning of the General Data Protection Regulation and the Data Protection Act 2018, for example, information about your health or ethnic origin.

## 1. Collecting information

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

1.1. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.

1.2. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.

1.3. From documents that are available to the public, such as the electoral register.

## 2. Using your personal information

2.1. Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:

2.1.1. To help us to identify you when you contact us.

2.1.2. To help us to identify accounts, services and/or products that you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).

2.1.3. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future.

2.1.4. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information.

2.1.5. To help to prevent and detect fraud or loss.

2.1.6. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners unless you have previously asked us not to do so.

2.1.7. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.

2.1.8. We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.

2.2. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.

2.3. We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:

2.3.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.

2.3.2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.

2.3.3. We employ companies and individuals to perform functions on our behalf and we may disclose your Personal Data to these parties for the purposes set out in clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use it for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the General Data Protection Regulation and the Data Protection Act 2018. From time to time, these other people and organisations to whom we may pass your Personal Data

may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy and the General Data Protection Regulation and the Data Protection Act 2018.

2.4. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.

2.5. In connection with any transaction which we enter into with you:

2.5.1. We, and other companies in our group, may carry out credit and fraud prevention checks with one or more licensed credit reference and fraud prevention agencies. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from the application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.

2.5.2. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.

2.5.3. If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Officer at Social Buff Limited at 22 Wenlock Road N1 7GU, or email us at [hello@socialbuff.com](mailto:hello@socialbuff.com).

### 3. Protecting information

We have strict security measures to protect Personal Data.

3.1. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.

3.2. We reveal only the last four digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.

3.3. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

3.4. You need to protect against unauthorised access to your password and your computer. Be sure to sign off when you finish using a shared computer.

#### 4. The internet

4.1. If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us Personal Data through the Website, we will normally give you the opportunity to say whether you would prefer us not to contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.

4.2. Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered – this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

#### 5. Cookies

When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'.

These cookies cannot be used to identify you personally and are used to improve services for you, for example through:

- Letting you navigate between pages efficiently
- Enabling a service to recognise your computer so you don't have to give the same information during one task
- Recognising that you have already given a username and password so you don't need to enter it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

See [allaboutcookies.org](http://allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu) to learn more about cookies.

Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these options, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer.

Multiple cookies may be found in a single file depending on which browser you use.

The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide, as follows:

#### Category 2: Performance Cookies

These cookies collect information about how visitors use a website, for instance, which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

#### Category 3: Targeting Cookies or Advertising Cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

The list below shows the cookies that we use, other than those that are strictly necessary to this service. If you have any queries about these, or would like more information, please contact our Data Protection Officer at Social Buff Limited at 22 Wenlock Road N1 7GU, or email us at [hello@socialbuff.com](mailto:hello@socialbuff.com).

#### Cookie name

##### `__ar_v4`

We use AdRoll to provide interest-based advertisements to show our ads on other websites. The technology to do this is made possible by cookies and as such we may place a so-called “remarketing cookie” during your visit. The whole process is entirely anonymised. This is a first-party cookie.

##### `_ga`

The Google Analytics library uses this cookie to store a unique client identifier (Client ID), which is a randomly generated number. Once the ID is generated it’s stored in the cookie and is included with each hit/request sent to Google Analytics. This ID is later used by Google Analytics servers to calculate user, session, and campaign data. This is a first-party cookie.

##### `_gat`

We use Google Analytics to assist with monitoring, and identifying areas of the site that can be improved. Your personal details are not tracked. The `_gat` cookie is used to throttle the request rate back to Google. This is a first-party cookie.

By using this website, you agree that we can place these types of cookies on your device.

## 6. Links

6.1. The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer Personal Data to these advertisers or third-party websites.

6.2. These third-party websites and advertisers, or internet advertising companies working on their behalf, sometimes use technology to send (or ‘serve’) the advertisements that appear on

the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about internet advertising companies (also called 'ad networks' or 'network advertisers'), including information about how to opt out of their information collection.

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

## 7. Further information

7.1. If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Officer at Social Buff Limited at 22 Wenlock Road N1 7GU, or email us at [hello@socialbuff.com](mailto:hello@socialbuff.com).

7.2. We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.

7.3. You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at [hello@socialbuff.com](mailto:hello@socialbuff.com). This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.

7.4. If you would like access to the Personal Data that we hold about you, you can do this by emailing us at [hello@socialbuff.com](mailto:hello@socialbuff.com) or writing to us at the address noted above.

7.5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it



promptly. Please email us at [hello@socialbuff.com](mailto:hello@socialbuff.com) or write to us at the address above to update your Personal Data.