

## PRIVACY POLICY

Fair-exchange.com is a brand managed by PDV Limited (“PDV” or “We”) who are specialists in the provision of consumer data for marketing and market research purposes and We are committed to protecting and respecting your privacy. We work closely with some of the UK's leading brands to help them target their offers better and help them learn more about what consumers want from their products. Fair-exchange.com provides manufacturers, retailers and service providers with the key information they need to serve you better.

As a leading data marketing company, PDV takes the issue of personal data and privacy extremely seriously. PDV is registered as a Data Controller with the Information Commissioner's Office, and as such your information will always be safeguarded through our adherence to the Data Protection Act 1998, and the Privacy and Electronic Communications Regulations (2003) to ensure that the information you provide to us is safe and only used for the purposes stated in the opt-in statement and this Privacy Policy.

PDV is also a member of the UK Direct Marketing Association (DMA) and fully complies with its protocols to properly ensure the correct use of data.

This Privacy Policy (together with our terms of use [www.Fair-exchange.com](http://www.Fair-exchange.com) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the “Act”), the Data Controller is PDV Ltd, Company No. 3974954, Registered in England. Registered Office: Green Heys, Walford Rd, Ross-on-Wye, HR9 5DB a subsidiary of DM plc.

### INFORMATION WE MAY COLLECT FROM YOU

Fair-exchange.com is keen to ensure that the principals of our opt-in when your data is collected are clearly explained. The information you volunteer to Fair-exchange.com and that PDV holds about you, will be shared and used to appropriately target offers and marketing communication from Fair-exchange.com, from our clients, from our selected third party partners (including Intelia Ltd) and from PDV and its other brands. Marketing communication may be through email, mailing, telemarketing, SMS/MMS and door-to-door canvassing, depending on which contact channel information you have volunteered. You may also receive marketing calls via automated voice broadcast over the telephone.

Some questions on our consumer surveys are specific to our named sponsors, and by expressing a positive interest in their brand or products you are also agreeing to contact from them. By volunteering your phone number you are agreeing to telephone contact by these named sponsors. You may subsequently need to contact these named sponsor brands directly if in the future you decide to opt-out of further communication from these brands.

We may collect and process the following data about you:

- Your data may be used for analytical purposes. Your data may also be used in conjunction with data we may have received from other sources in order to improve personalised and targeted communications, and we may share information with other companies for the same reason.
- Your data may be shared and combined with other companies who hold your personal data, and we may use information from other sources to add to data we already hold. This information may help us to improve our ability to service your needs on a personalised basis, by helping us to learn more about you and your purchasing habits and allowing us to let you know about offers you might be interested in.
- Your data may be used for data validation, enhancement, information verification, suppression, tracing and to the extent permitted by law, individual reference or look-up services, by PDV and third parties.
- Please remember that you can de-register from Fair-exchange.com at any time (see Deregistration below). Furthermore you can request suppression of your details from PDV's database if you would prefer us not to use your information for any of the above.
- You can also request to know what personal information PDV holds about you, by writing in person to us at the address below asking for subject access request.

- PDV may also receive information about you when you register on one of our affiliate or partner sites, or when you take part in a special promotion for one of these affiliates or partners. If you have registered with Fair-exchange.com through one of our third party partner sites, it is possible that the third party site may also retain your data, but only in accordance with the terms and conditions as published by them on their site.
- By filling in forms on our site [www.Fair-exchange.com](http://www.Fair-exchange.com) (“our site”). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services.

### IP ADDRESSES AND COOKIES

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate.

Cookie	Name	Purpose	More information
ASPXANONYMOUS	<a href="http://www.Fair-exchange.com">www.Fair-exchange.com</a>	Our cookie tracks a users movement throughout the site and also acknowledges them when they return. Our cookie does not hold any personal data  This cookie enables us to: <ul style="list-style-type: none"> <li>• Uniquely identify the user to .net, which maintains copies of the variables from page to page as part of a session.</li> </ul>	ASP.NET_SessionId=czgal4i13uuocxdqtkjwbtbxx
Google analytics	Google	Google Analytics tracks uses cookies in order to provide meaningful reports about your site visitors. Google Analytics cookies do not collect personal data about your website visitors.	Types of cookie __utma __utmb __utmc __utmz __utmx

Please note that our advertisers may also use cookies, over which we have no control. You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.

### WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our 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.

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will contact you by e-mail, phone, post or SMS with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data the order form or registration form.

## **DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your personal information to third parties:

- In the event that we sell any business or assets we may disclose your personal data to the prospective buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of PDV, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at PDV, Compliance Department, 64 Clarendon Road, Watford, WD17 1DA.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **DEREGISTRATION**

You can unsubscribe from Fair-exchange.com email communications at any time by clicking on the link at the foot of any email correspondence. Your details will be suppressed, Fair-exchange.com will send no further emails and your details will no longer be passed onto any third parties for the uses described in this Privacy Policy.

You can also deregister from Fair-exchange.com at any time through the website. Your details will then be suppressed and Fair-exchange.com will send no further email communication.

To request suppression from PDV completely, please write to us at the address at the bottom of this Privacy Policy, or email [client.services@pdvltd.com](mailto:client.services@pdvltd.com)

## **DATA SECURITY**

Although we endeavour to ensure the security of all correspondence, the Internet is not a 100% secure medium. Therefore, we are unable to guarantee the security of any data you send electronically to Fair-exchange.com and are unable to accept responsibility for any loss or damage experienced through any loss of confidentiality of your information.

## **RIGHT OF TRANSFER**

Should Fair-exchange.com or PDV choose to sell or transfer business assets, it is possible that the information we hold may be transferred as part of the transaction. Fair-exchange.com or PDV may choose to retain a copy of the information post sale or transfer.

## **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **USEFUL LINKS**

As members of the Direct Marketing association we are keen to promote the best interests of consumers and how their personal data is used. If you would like to know more about how your information can be utilised, how you can restrict its use, who has access and a wide range of other aspects, we suggest you refer to the following sources:

- The Direct Marketing Association; [www.dma.org.uk](http://www.dma.org.uk)
- The Information Commissioner; [www.ico.gov.uk](http://www.ico.gov.uk)
- The Citizens Advice Bureau; [www.adviceguide.org.uk](http://www.adviceguide.org.uk)

For further information please write to:

Compliance Department  
Fair-exchange.com  
PDV Ltd  
64 Clarendon Road  
Watford  
WD17 1DA