

## **Introduction**

GDPR is an opportunity to build a stronger data protection foundation for the benefit of all. Trim City takes its obligations around data processing and security very seriously. Our senior members here at Trim City ensure that we are GDPR-compliant. For every new product development and enhancement to our service, we're proactively applying the Data Protection by design principles.

This is the privacy policy for the Trim City Platform (as defined in our Terms and Conditions) that we make available from time to time. Trim City is owned and operated by Trim City Limited (we, us and our). For the purposes of EU data protection laws, we are the data controller.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO at [contact@trimcity.london](mailto:contact@trimcity.london)

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 contact us in the first instance.

We are committed to protecting your privacy online. We appreciate that you do not want the information you provide to us to be distributed indiscriminately and here we explain how we collect information, what we do with it and what controls you have over it.

By using the Trim City Platform, you consent to the collection and use of your personal information in accordance with this privacy policy. If you do not agree with the use of your personal information as set out in this privacy policy, or the Terms and Conditions, please do not use the Trim City Platform.

We reserve the right to change this privacy policy from time to time. If we make material changes to this privacy policy, we will notify you by means of a prominent notice prior to the change becoming effective.

## **Information we may collect from you**

We may collect and process the following information about you:

- Information (such as your name, email address, gender, date of birth, photographs, postal address and telephone number) that you provide us, book an appointment for any service, upload or submit any material via the Trim City Platform, contact any service provider via the Trim City Platform or enter into any competition or promotion we may sponsor;
- In connection with an account sign-in facility, your log-in and password details;
- If you decide to register through or otherwise grant access to us via a third-party social networking site such as Facebook, Instagram, Twitter or Google, we may also collect personal information that is already associated with such site;
- The content of any communications you send to us, for example, to report a problem or to submit queries, concerns or comments regarding the Trim City Platform or its content;
- Any search terms you looked up and results that you selected;
- Friend or contact lists that you may provide to us by connecting your Trim City your computer, mobile device, or third-party social network accounts;

- Information from surveys that we may, from time to time, run on the Trim City Platform, if you choose to participate in them;
- Geographical location so that we can provide you with information about the services provided by businesses near to your location; and
- Other information from your use of the Trim City Platform including, the type of internet browser or mobile device you use, any website from which you have come to the Site and your IP address (the unique address which identifies your computer or mobile device on the Internet) and your operating system, which are automatically recognised by our web server.

We do not collect any Special Categories of Personal Data about you, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We may record and monitor telephone calls for training and quality control purposes as well as to verify the details of any contract we may agree with you over the phone.

Your name, as well as any photo you submit for your profile, any services or any businesses that you book appointments with and any recommendations you make, can be publicly displayed as part of your profile. Appointments booked will also be publicly displayed on the applicable service provider's profile. You can make changes to some of your account information through Settings.

You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services.

### **Uses made of your information**

We have set out below, in a table format, a description of all the ways we plan to use your data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Publishing information about your business on UENI</p> <p>(b) Notifying you about changes to our terms or privacy policy</p> <p>(c) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

Subject to receiving your consent, we may also use your personal information to notify you of new products or services and special offers we think you may be interested in, and share your personal information with carefully selected third parties so they can send you information directly which you may find useful regarding their products and services although, such third parties may have their own privacy policies and we are not responsible for how those third parties use your personal information. However, you will only receive these communications where you consented to receive such communications either at the point of registration or at any point after. You can unsubscribe from such communications at any time, by contacting us by email at [contact@trimcity.london](mailto:contact@trimcity.london). However, if you do unsubscribe you may not be able to benefit from the full service and functionality of Trim City and potential promotions.

## **Refer a Friend Schemes**

We may, from time to time, run referral programmes or similar initiatives, such as a "Refer a Friend" programme, that invite you to provide us with the contact details of someone who is known to you who may find our products or services to be of interest. We will only use those contact details for the purpose of the relevant initiative (and not for general marketing purposes). By providing us with their details, you confirm that you have their permission to do so and must not provide us with the details of anyone from whom you do not have such permission. We reserve the right to identify you as the person who has made the referral in the message that is sent to them. We will not use your friend's information for any other purpose unless they consent to us doing so.

## **Information sharing**

We may disclose aggregate statistics about visitors to the Trim City Platform, customers and sales in order to describe our services to prospective partners, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

We may disclose your personal information to any of our affiliates, service providers, or to our agents or sub-contractors who assist us in providing the services we offer through the Trim City Platform, processing transactions, booking appointments for the services, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks, from time to time. Our agents and contractors will only use your personal information to the extent necessary to perform their functions and will be required by us to implement measures to protect your personal information.

In the event that we undergo a reorganisation or are sold to a third party, you agree that any personal information we hold about you may be transferred to that reorganised entity or third party.

We may disclose your personal information if required to do so by law or if we believe that such action is necessary to prevent fraud or cybercrime or to protect the TRIM CITY Platform or the rights, property or personal safety of any person.

## **Public forums**

The information you contribute through the Trim City Platform is public, including your reviews, photos, comments, which Service Providers you add as favourites, and your friend lists. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these and consider carefully before disclosing your personal information.

## **Security and storage of your personal information**

We place great importance on the security of our users' personal information. We have security measures in place to help us protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

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

You should bear in mind that submission of information over the Internet is never entirely secure. We cannot guarantee the security of information you submit via the Trim City Platform whilst it is in transit over the Internet and any such submission is at your own risk.

It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information if you use a shared computer or a computer in a public place.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Details of retention periods for different aspects of your personal data are available by contacting us at [contact@trimcity.london](mailto:contact@trimcity.london)

#### Transfers out of the EEA

We may need to transfer your personal information to data who may be located outside the European Economic Area (EEA) including to countries that do not offer the same level of protection with respect to personal information as required in the EEA. Where we transfer your personal information to data processors outside of the EEA we ensure that written agreements are in place incorporating clauses approved by the European Commission which give personal data the same protection it has in Europe. We will take all reasonable steps to ensure that your privacy rights continue to be protected by ensuring that by submitting personal information via the TRIM CITY Platform, you acknowledge and consent to the transfer of your personal information outside of the EEA.

#### **Your rights**

You have a right under EU data protection laws to access your personal information. On request, we will provide you with a copy of this information. 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. You also have a right to correct any errors or inaccuracies in that personal information and a right to object to the processing of your personal information.

If you wish to exercise any of these rights you should send an email to [contact@trimcity.london](mailto:contact@trimcity.london)

#### **Contacting us**

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to [contact@trimcity.london](mailto:contact@trimcity.london)

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