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1. IMPORTANT INFORMATION AND WHO WE ARE

This Privacy Policy has been prepared in accordance with the General Data Protection Regulations (“GDPR”). The GDPR aims to protect and enhance the rights of data subjects. The Mastermelt Group of Companies recognises the importance of the correct and lawful treatment of personal information and will only use personal data as set out in this Privacy Policy. This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

We know that there is a lot of information here, but we want you to be fully informed about your rights, and how the Mastermelt Group of Companies uses your data.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or terms and conditions we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

CONTROLLER

The Mastermelt Group of Companies is made up of different legal entities, details of which can be found here [www.mastermeltgroup.com]. This Privacy Policy is issued on behalf of The Mastermelt Group of Companies so when we mention “The Mastermelt Group”, “we”, “us, or “our” in this Privacy Policy, we are referring to the relevant company in the Mastermelt Group responsible for processing your data. Mastermelt Ltd is the controller for the Mastermelt Group website.

We have appointed a Data Protection Officer to oversee compliance with this Privacy Policy. If you have any questions about the Privacy Policy or how we handle your personal data, please contact our Data Protection Officer by email or post.

You have the right to request a copy of any information about you that the Mastermelt Group holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact **Data Protection Officer, Mastermelt Ltd, 56 Hatton Garden, London, EC1N 8HP**, or email **SAR@mastermeltgroup.com**. To ask for your information to be amended, please update your online account, or contact the relevant Group Company directly.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. We may change this Privacy Policy at any time by updating this page so you should therefore check our website from time to time to ensure you are aware of any changes. If material changes are made to this Privacy Policy, we will notify you by placing a prominent notice on the Mastermelt Group website.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (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** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes 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 the website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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 Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect 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 and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone email or otherwise. This includes personal data when you:
 - create a Trade Account with us
 - sign up for a website / app account
 - supply us material to process
 - engage with us on Social Media
 - download or install one of our apps
 - enter one of our competitions
 - ask us to email you information about a service we provide
 - contact us via any means with a query , complaint or quotation request
 - attend one of our events
 - choose to complete any surveys we send you
 - fill in any forms we provide you
 - comment on or review us or our services
 - visit our premises which have CCTV systems operated for the purposes of security. These systems may record your image during your visit.
 - visit our premises operating electronic sign in systems. These systems will request and store your personal information in order to manage our security at these sites.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

CMJ – The Company or Master Jewellers – Member Lists / Public Website

NAJ – National Associated of Jewellers – Public Website

4. HOW WE USE YOUR PERSONAL DATA

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive push notifications from our website / app.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if we process / purchase your material we will need to contact you to advise you of the results and to supply you with an invoice. Your contact information will be used to facilitate this requirement.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we are obliged to keep records of our transactions in order to comply with HRMC regulations.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

As a customer we will use your email address details to send you newsletters detailing our activities, services and to supply information useful to your business.

We may use your telephone contact details to discuss our services and check if you have material available for collection / processing.

We may use your address details to send you direct marketing information by post, telling you about our services that we think might interest you.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|---|--|
| Contacting you regarding orders | Identity, Contact | Performance of contract |
| Register you as a new customer | Identity, Contact, Financial | Necessary to comply with a legal obligation Performance of a contract with you |
| Retain transactions | Financial | Necessary to comply with a legal obligation |
| Record CCTV images | Identity | Legitimate business interests – safeguarding the business and its assets against crime and protecting the safety of our staff and customers. |
| Signing in Visitors | Identity | Legitimate business interests - safeguarding the business and its assets against crime and protecting the safety of our staff and customers. |
| Email newsletters to you | Identity, Contact, Marketing and Communications | Legitimate business interests - to maintain our relationship with the customers and to keep them informed of our activities, new equipment, processing capabilities. Consent (prospective customers) |
| Sending you marketing information by post | Identity, Contact, Marketing and Communications | Legitimate business interests – promotion of our business in terms of our processing capabilities and the services we can offer. Also, maintaining existing business by informing customers when a Mastermelt representative is visiting their area. |
| Contacting you by telephone to discuss our services | Identity, Contact, Marketing and Communications | Legitimate business interests – promotion of our business in terms of our processing |

| | | |
|--|--|---|
| | | capabilities and the services we can offer. Also, maintaining existing business by informing customers when a Mastermelt representative is visiting their area and seeking information on whether there is material available for collection. |
|--|--|---|

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- Within our CRM system we have preference fields covering email, telephone and postal communications. If you choose to object to a form of communication, this will be updated on your record to ensure you are not contacted via this method ongoing.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased good or services from us or if you or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time. Here are the ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from being sent to you.
- On our website, you can manage your preferences and opt out from email / push notifications by selecting or deselecting the relevant options in the 'Account' section. We will then stop sending job tracking updates to you.
- Contact the relevant Group Company directly and the admin team will update your preferences for each communications channel on our systems.
- Write to **Data Protection Officer, Mastermelt Ltd, 56 Hatton Garden, London, EC1N 8HP.**

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any transaction you make with us.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

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 you wish to get an explanation as to how the processing for the new purposes is compatible with the original purpose please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. DISCLOSURES OF PERSONAL DATA

We sometimes share your personal data with trusted third parties, only when this is absolutely necessary to allow us to fulfil our contractual or legal requirements.

For example delivery couriers, shipping agents, police / hmrc requests and the facilitation of bank / metal transfers

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

The third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers / shipping agents.

- Direct marketing companies who help us manage our electronic communications with you.
- Banks and financial organisations.
- Government and legal organisations.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

6. INTERNATIONAL TRANSFERS

We share your personal data within The Mastermelt Group. This will involve transferring your data outside the European Economic Area.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called “binding corporate rules”.

7. DATA SECURITY

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

- Access to your personal data within all of our systems is password-protected and access levels granted based on job role.
- We regularly monitor our network and systems for possible vulnerabilities and attacks, and operate industry leading antivirus and firewall technologies.
- We secure access to all areas of our websites and apps using ‘https’ technology.

8. DATA RETENTION

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 your personal data is required and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. YOUR LEGAL RIGHTS

An overview of your different rights

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see above), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. 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, at the time of your request.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, 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.

If you wish to exercise any of the rights set out above, please contact **Data Protection Officer, Mastermelt Ltd, 56 Hatton Garden, London, EC1N 8HP**, or email **SAR@mastermeltgroup.com**. To ask for your information to be amended, please update your online account, or contact the relevant Group Company directly.

If we choose not to action your request we will explain to you the reasons for our refusal.

NO FEE USUALLY REQUIRED

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.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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 to speed up our response.

TIME LIMIT TO RESPOND

We 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.

10. CONTACTING THE REGULATOR

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113).

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

11. ANY QUESTIONS?

We hope this Privacy Policy has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us at DPO@mastermeltgroup.com.

Or write to us at **Data Protection Officer, Mastermelt Ltd, 56 Hatton Garden, London, EC1N 8HP.**