This Privacy Policy describes how www.consciousbutterfly.co.uk (the "Site" or "we") collects, uses, and discloses your Personal Data when you visit or make a purchase from the Site.

## **Collecting Your Personal Data**

When you visit the Site, we collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional information if you contact us for customer support. In this Privacy Policy, we refer to any information that can uniquely identify an individual (including the information below) as "Personal Data". See the list below for more information about what Personal Data we collect and why.

#### Device information

- **Examples of Personal Data collected:** version of web browser, IP address, time zone, cookie information, what sites or products you view, search terms, and how you interact with the Site.
- **Purpose of collection:** to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
- **Source of collection:** Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels
- Disclosure for a business purpose: shared with our processor WooCommerce

#### Order information and Customer support information

- **Examples of Personal Data collected:** name, billing address, shipping address, payment information (including credit card numbers, PayPal accounts, debit card numbers and other types of accounts, email address, and phone number.
- Purpose of collection: to provide products or services to you to fulfil our contract, to
  process your payment information, arrange for shipping, and provide you with invoices
  and/or order confirmations, communicate with you, screen our orders for potential risk or
  fraud, and when in line with the preferences you have shared with us, provide you with
  information or advertising relating to our products or services, and provide customer
  support.
- Source of collection: collected from you.
- **Disclosure for a business purpose:** shared with our processor WooCommerce, our payment gateways, our fulfilment centre.

# **Using Personal Data**

We use your Personal Data to provide our services to you, which includes: offering products for sale, processing payments, shipping and fulfilment of your order, and keeping you up to date on new products, services, and offers.

### Lawful basis

We process your personal Data under the following lawful bases:

- Your consent:
- The performance of the contract between you and the Site;
- Compliance with our legal obligations;
- For our legitimate interests, which do not override your fundamental rights and freedoms.

### Retention

When you place an order through the Site, we will retain your Personal Data for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will either be deleted completely or anonymised. See the 'Your rights' section below for information on your right of erasure.

# **Your rights**

An overview of your different rights You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- The deletion of the data we hold about you, in specific circumstances. For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end.
- A computer file in a common format (e.g. CSV or similar) containing the personal data that you have previously provided to us and the right to have your information transferred to another entity where this is technically possible.
- Restriction of the use of your personal data, in specific circumstances, generally whilst we
  are deciding on an objection you have made.
- That we stop processing your personal data, in specific circumstances. For example, when you have withdrawn consent, or object for reasons related to your individual circumstances.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by us of any decision made based solely on automatic processing of your data (ie where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time by contacting us on the contact information below.

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

#### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

#### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **Behavioural Advertising**

As described above, we use your Personal Data to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For example:

• We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Data here: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>. You can also opt-out of Google Analytics here: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <a href="http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work">http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work</a>.

You can opt out of targeted advertising by:

- FACEBOOK <a href="https://www.facebook.com/settings/?tab=ads">https://www.facebook.com/settings/?tab=ads</a>
- GOOGLE https://www.google.com/settings/ads/anonymous
- BING <a href="https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads/">https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads/</a>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <a href="http://optout.aboutads.info/">http://optout.aboutads.info/</a>.

## **Automatic decision-making**

You have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We do not engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Our processor WooCommerce uses limited automated decision-making to prevent fraud that does not have a legal or otherwise significant effect on you.

Services that include elements of automated decision-making include:

- Temporary denylist of IP addresses associated with repeated failed transactions. This denylist persists for a small number of hours.
- Temporary denylist of credit cards associated with denylisted IP addresses. This denylist persists for a small number of days.

## **Sharing Your Personal Data**

We share your Personal Data with service providers to help us provide our services and fulfil our contracts with you, as described above. For example:

- We use WooCommerce to power our online store. You can read more about how WooCommerce uses your Personal Data here: https://woocommerce.com/document/marketplace-privacy/.
- We may share your Personal Data to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.
- We use Stripe to process your payments.

We only provide the Personal Data that they need to perform their specific services. They may only use your Data for the exact purposes we specify in our contract with them.

See WooCommerce's GDPR Whitepaper: <a href="https://woocommerce.com/gdpr/">https://woocommerce.com/gdpr/</a> This is necessary for the performance of our contract with you.

## **Cookies**

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

We use the following cookies to optimize your experience on our Site and to provide our services.

## **Cookies Necessary for the Functioning of the Store**

#### Store front end:

COOKIE NAME	DURATION	PURPOSE	
woocommerce_cart_hash	session	Helps WooCommerce determine when cart contents/data changes.	
woocommerce_items_in_cart	session	Helps WooCommerce determine when cart contents/data changes.	
wp_woocommerce_session_	2 days	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer.	
woocommerce_recently_viewed	session	Powers the <u>Recent Viewed</u> <u>Products</u> widget.	
store_notice[notice id]	session	Allows customers to dismiss the <b>Store Notice</b> .	

No personal information is stored within these cookies.

Store dashboard (/wp-admin):

COOKIE NAME	DURATION	PURPOSE
woocommerce_snooze_suggestions[suggestion]	2 days	Allows dashboard users to dismiss Marketplace suggestions, if enabled.
woocommerce_dismissed_suggestions[context]	1 month	Count of suggestion dismissals, if enabled.
tk_ai	session	Stores a randomly- generated anonymous ID. This is only used within the dashboard (/wp-admin) area and is used for usage tracking, if enabled.

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the "Behavioural Advertising" section above.

### **Do Not Track**

Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

# **Changes**

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

### **Contact**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at hello@consciousbutterfly.co.uk or by mail using the details provided below:

Conscious Butterfly, Yn Alban, 44 Westmoreland Road, Douglas, IM1 4AN, Isle of Man

Last updated: 07/12/2021

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here: <a href="https://www.inforights.im">https://www.inforights.im</a>.