
PRIVACY POLICY

BACKGROUND:

This Policy applies as between you, the User of this Website and 33 Joints Ltd the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Data”	means collectively all information that you submit to the 33 Joints Ltd via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“Cookie”	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;
“33 Joints Ltd”	means 33 Joints Ltd trading as Blowfish Shoes of 33 Park Rd, Bushey, Hertfordshire WD23 3EE 020 8421 7070 ;
“UK and EU Cookie Law”	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
“User”	means any third party that accesses the Website and is not employed by 33 Joints Ltd and acting in the course of their employment; and
“Website”	means the website that you are currently using (www.blowfishshoes.co.uk) and any sub-domains of this site (e.g. subdomain.www.blowfishshoes.co.uk/shoes/) unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of 33 Joints Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

- 3.1 [name;]
- 3.2 [date of birth;]
- 3.3 [gender;]
- 3.4 [job title;]
- 3.5 [profession;]
- 3.6 [contact information such as email addresses and telephone numbers;]
- 3.7 [demographic information such as post code, preferences and interests;]
- 3.8 [financial information such as credit / debit card numbers;]
- 3.9 [IP address (automatically collected);]
- 3.10 [web browser type and version (automatically collected);]
- 3.11 [operating system (automatically collected);]
- 3.12 [a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected); and]

4. **Our Use of Data**

- 4.1 Any personal Data you submit will be retained by 33 Joints Ltd for six months.
- 4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties. This [includes] **OR** [does not include] our affiliates and / or other companies within our group.
- 4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.
- 4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - 4.4.1 [internal record keeping;]
 - 4.4.2 [improvement of our products / services;]
 - 4.4.3 [transmission by email of promotional materials that may be of interest to you;]
 - 4.4.4 [contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.]

5. **Third Party Websites and Services**

- 5.1 33 Joints Ltd may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services [do not] have access to certain personal Data provided by Users of this Website.
- 5.2 [Any Data used by such parties is used only to the extent required by them to perform the services that 33 Joints Ltd requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties

shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.]

6. **Links to Other Websites**

This Website may, from time to time, provide links to other websites. 33 Joints Ltd has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

7. **Changes of Business Ownership and Control**

7.1 33 Joints Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of 33 Joints Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

7.2 In the event that any Data submitted by Users is to be transferred in such a manner, you will [not] be contacted in advance and informed of the changes. [When contacted you [not] be given the choice to have your Data deleted or withheld from the new owner or controller.]

8. **Controlling Use of Your Data**

8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

8.1.1 use of Data for direct marketing purposes; and

8.1.2 sharing Data with third parties.

9. **Your Right to Withhold Information**

9.1 You may access [certain areas of] the Website without providing any Data at all. [However, to use all features and functions available on the Website you may be required to submit certain Data.]

9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12.

10. **Accessing your own Data**

You have the right to ask for a copy of any of your personal Data held by 33 Joints Ltd (where such data is held) on payment of a small fee which will not exceed £<<insert sum>>.

11. **Security**

11.1 Data security is of great importance to 33 Joints Ltd and to protect your Data we have put in place suitable physical, electronic and managerial procedures

to safeguard and secure Data collected via this Website.

12. Cookies

- 12.1 This Website may place and access certain first party Cookies on your computer. First party cookies are those placed directly by 33 Joints Ltd via this Website and are used only by 33 Joints Ltd. 33 Joints Ltd uses Cookies to improve your experience of using the Website and to improve our range of [products] **AND/OR** [services]. 33 Joints Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 12.2 By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than 33 Joints Ltd. Third party cookies are used on this Website for analysing website traffic and are detailed in full below. These cookies are not integral to the services provided by the Website.
- 12.3 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 12.4 Before [any] Cookies are placed on your computer[, subject to sub-Clause 12.5] **AND/OR** [sub-Clause 12.8], you will be presented with a popup message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling 33 Joints Ltd to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended. [You will be given the opportunity to allow only first party Cookies and block third party Cookies.]
- 12.5 [Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser’s settings as detailed below.]
- 12.6 The following first party Cookies may be placed on your computer:

Name of Cookie	Purpose	Strictly Necessary
<<insert file name>>	<<insert description>>	<<yes / no>>
<<insert file name>>	<<insert description>>	<<yes / no>>
<<insert file name>>	<<insert description>>	<<yes / no>>
<<insert file name>>	<<insert description>>	<<yes / no>>
<<insert file name>>	<<insert description>>	<<yes / no>>

and the following third party Cookies may be placed on your computer:

Name of Cookie	Provider	Purpose
<<insert file name>>	<<insert name of provider>>	<<insert description>>
<<insert file name>>	<<insert name of provider>>	<<insert description>>
<<insert file name>>	<<insert name of provider>>	<<insert description>>
<<insert file name>>	<<insert name of provider>>	<<insert description>>
<<insert file name>>	<<insert name of provider>>	<<insert description>>

12.7 This Website uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the [products] **AND/OR** [services] offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our business.

12.8 The analytics services used by this Website use Cookies to gather the required information. [Certain of these Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.]

12.9 The analytics services used by this Website use the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
<<insert file name>>	<<first / third>>	33 Joints Ltd	<<insert description>>
<<insert file name>>	<<first / third>>	33 Joints Ltd	<<insert description>>
<<insert file name>>	<<first / third>>	33 Joints Ltd	<<insert description>>
<<insert file name>>	<<first / third>>	33 Joints Ltd	<<insert description>>
<<insert file name>>	<<first / third>>	33 Joints Ltd	<<insert description>>

12.10 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

12.11 You can choose to delete Cookies at any time however you may lose any

information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

12.12 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

13. **Changes to this Policy**

33 Joints Ltd reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.