



Privacy Policy

WEBSITE INFORMATION

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all GDPR guidelines and requirements for user privacy.

We wish to be as fair and transparent as possible in everything we do. We take your privacy and requests very seriously. If at any time you wish to get personal feedback from us about this policy then please contact us.

We have appointed a data privacy manager (DPM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

info@bearandbear.com

To contact us by post please use the following address:

Bearstore Limited, International House, 12 Constance Street, London, E16 2DQ

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 (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.

GDPR OVERVIEW IN 3 PARAGRAPHS

What and Who

The GDPR is a European Union (EU) privacy law that will affect businesses around the world when it becomes enforceable on May 25, 2018. It regulates how any organization that is subject to the Regulation treats or uses the personal data of people located in the EU. Personal data is any piece of data that, used alone or with other data, could identify a person. If you collect, change, transmit, erase, or otherwise use or store the personal data of EU citizens, you'll need to comply with the GDPR.

The GDPR will replace an older directive on data privacy, Directive 95/46/EC, and it introduces a few important changes that may affect Bear & Bear users.



About Consent

You need to have a legal basis, like consent, to process an EU citizen's personal data. Under the GDPR, you may use another legal basis for processing personal data, but we anticipate that many Bear & Bear users will rely on consent. This consent must be specific and verifiable.

Verifiable consent requires a written record of when and how someone agreed to let you process their personal data. Consent must also be unambiguous and involve a clear affirmative action. This means clear language and no pre-checked consent boxes.

About Individual Rights

The GDPR also outlines the rights of individuals around their personal data. EU citizens will have the right to ask for details about the way you use their personal data and can ask you to do certain things with that data. You should be prepared to support people's requests in a timely manner. People have the right to request their personal data be corrected, provided to them, prohibited for certain uses, or removed completely.

You should also be able to tell someone among other things, how their personal data is being used. If they ask, you're obligated to share the personal data you hold on an individual, or offer a way for them to access it.

YOUR LEGAL RIGHTS

Under the privacy regulations you have rights under data protection laws in relation to your personal data:

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.

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 below), 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, if applicable, at the time of your request.

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 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.

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.

Some further information relating to these rights:

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.

USE OF COOKIES

We use cookies on the website for a number of reasons which you can learn about below. Our main reason for using cookies is to deliver a better user experience and ensure a personalised browsing environment.

The cookies we use do not store personally identifiable information nor can they harm your computer. We want our website to be informative, personal, and as user friendly as possible and cookies help us to achieve that goal.

By using Bear & Bear, you agree to the use of cookies and other technologies as set out on here. We appreciate some users may like more individual control over their visit to our website and you can adjust your browser settings accordingly. You can read all about this in the section below "How to control and delete cookies". If you do not agree to such use, please refrain from using the website.

A cookie is a small file and holds a certain amount of data, which the website can send to your browser. It may then be stored on your computer's hard drive and can be accessed by our web server. This cookie data can then be retrieved and can allow us to customise our web pages and services accordingly. It's important to clarify that cookies do not collect any personal data stored on your hard drive or computer.

You can find out all about cookies from this website [AllAboutCookies.org](https://www.allaboutcookies.org).

Our website uses both persistent and session cookies:

Persistent cookies are used to allow the website to recognise users when they return to the site and to remember certain information about their preferences. These cookies are cookies which stay on your computer permanently, until you "manually" delete them.



Session cookies are used in order to allow customers to carry information across pages of the website, without having to re-enter such information. These cookies delete themselves automatically when you leave a website and go to another, or when you shut down your browser.

We have also developed relationships with carefully selected and monitored partners, to assist in the delivery of a high quality website. Some of these partners may also set cookies during your visit to support customisation of adverts that you may see elsewhere on the Internet, and/or in order to meet contractual obligations with us.

While these cookies do not store any personal details relating to you or your credit cards, please note we do not have access or control over the cookies and similar technologies that our partners use.

To enrich our website content, sometimes we may embed video content from other social media websites such as YouTube or Facebook. As a result, when you visit a page with content embedded, you may be presented with cookies from these websites. Bear & Bear LTD has no control or liability over these cookies set, so you should check the relevant third party's cookie policy for more information.

We also offer a 'share page' widget on some of our web pages, where content can be shared easily on a number of external websites. These sites may set a cookie when you are logged into their service. Bear & Bear Limited has no control or liability over these cookies set, so you should check the relevant third party's cookie policy for more information.

Should you choose to disable, reject or block our cookies, some parts of our website will not function fully, or in some cases, our website will not be accessible at all. Our cookies do not contain any personally identifying information, but they do enable us to provide features such as enabling us to store items in your shopping basket between visits. Most web browsers automatically accept cookies, but you can usually change your browser settings to prevent this. It is not possible to make a purchase unless you have cookies turned on and we recommend that you leave them turned on.

For more information on how to control your cookie settings and browser settings, or how to delete cookies on your hard drive, please visit AllAboutCookies.org.

The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Disabling cookies may result in loss of functionality of the website.

DATA COLLECTED

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 follows:

1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
3. **Financial Data** may include payment card details.
4. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
5. **Technical Data** may includes internet protocol (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 this website.
6. **Profile Data** may include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
7. **Usage Data** may include information about how you use our website, products and services.
8. **Marketing and Communications Data** may include 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. 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 notice.

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.

HOW IS DATA COLLECTED?

We use different methods to collect data from and about you including through:

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - (a) analytics such as Google;
 - (b) advertising networks based inside or outside the EU; and
 - (c) search information providers based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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 you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you i.e. selling you a product and shipping it to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. i.e. retargeting you with relevant marketing
- Where we need to comply with a legal or regulatory obligation.

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. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate

(b) Collect and recover money owed to us	(e) Marketing and Communications	interests (to recover debts due to us)
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To manage our relationship with you which will include:		(a) Performance of a contract with you
(a) Notifying you about changes to our terms or privacy policy	(a) Identity	(b) Necessary to comply with a legal obligation
(b) Asking you to leave a review or take a survey	(b) Contact	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
	(c) Profile	
	(d) Marketing and Communications	

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	(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
	(b) Contact	
	(c) Technical	

		business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
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)



Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

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).

We always try to make our marketing and promotions to you as relevant as possible. We don't want to waste your time (or ours) sending you information that it is not engaging.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us 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.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Bear & Bear for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

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. For more information about the cookies we use, please see our cookie policy.

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 purpose 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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DATA DISCLOSURE

We may have to share your personal data with the parties set out below for the purposes set out in the table above in "HOW WE USE YOUR DATA".

Third parties to whom we may choose to transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer your personal data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring anyone handling data at Bear & Bear to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see European Commission: Binding corporate rules.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:



- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- IF we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY AND RETENTION

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

How long will you use my personal data for?

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.



In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

THIRD-PARTY AND EXTERNAL LINKS

This website includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Although this website only looks to include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

ADVERTS AND SPONSORED LINKS

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertisers website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computers hard drive. Users should therefore note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

SOCIAL MEDIA PLATFORMS

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage



users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

SHORTENED LINKS IN SOCIAL MEDIA

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy urls.

Users are advised to take caution and good judgement before clicking any shortened urls published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine urls are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

RESOURCES AND FURTHER INFORMATION

Please search online or click the links for information if you want to learn more about the general regulations for privacy policies in the UK and specific websites:

Data Protection Act 1998

Privacy and Electronic Communications Regulations 2003

Privacy and Electronic Communications Regulations 2003 – The Guide

Twitter Privacy Policy

Facebook Privacy Policy

Google Privacy Policy

Linkedin Privacy Policy

Mailchimp Privacy Policy

Guide to GDPR:

IAB Europe's GDPR Compliance Primer

v.6.1 September 2019 Edited & customised by: Bearstore Limited,

International House, 12 Constance Street, London, E16 2DQ

GLOSSARY

LAWFUL BASIS

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.

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.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the EU or possibly internationally who provide IT and system administration services.
- Professional advisers acting as processors or possibly joint controllers including lawyers, bankers, auditors, fraud prevention agencies and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.