



Privacy Policy

Scope

This policy describes StraightForward's collection, use and disclosure of Personal Data of our Partners, Customers, Subscribers and Visitors. This policy does not apply to third parties with whom data is shared other than by StraightForward.

- Partners are persons to which StraightForward provides or is provided goods or services in the course of StraightForward's activities. This includes, but is not limited to, services for sales channels, payment processors, paid advertisement or operations and fulfillment.
- Customers are persons who purchase goods or services from StraightForward whether directly or through channels provided by Partners.
- Subscribers are persons who voluntarily provide information to StraightForward without the purchase of goods or services, typically when subscribing to marketing content.
- Visitors are persons not in one of the above categories who visit or contact StraightForward through our websites, by email, sales channels provided by Partners or otherwise.

Types Of Personal Data

Personal Data means information relating to an identified or identifiable natural person (Data Subject) concordant with data protection regulations applicable to that Data Subject.

Category	Types of Personal Data collected	Applicable Data Subject types
Identifiers	Details - name, email address and phone number	Partners, Customers,

		Subscribers
	Delivery - delivery address, contact name and phone number	Partners, Customers
	Business - tax, VAT and other government-issued identification numbers	Partners
Financial information	Payment - billing address and payment information (credit or debit card details and/or bank account information)	Partners, Customers
Commercial information	Transaction - products or services purchased, date of transactions and other information provided by Partners when purchases are made through them such as public profile information	Customers
	Other - any other information which has been proactively shared with us by email, messaging through Partner platforms, or otherwise, for the provision of a specific	Partners, Customers, Subscribers, Visitors
Internet activity	Internet activity - browser and device information (such as IP address, country, browser and other metadata), information provided through cookies (Google Analytics), service and website usage tracking, website cookies and demographic information provided by Partners	Subscribers, Visitors

Data Subjects may exist in more than one type. Data is not intentionally collected from children under the age of 16.

Visitors are clearly informed of, and provide separate consent for, the presence and use of cookies where they are used in StraightForward's online presence.

Uses Of Personal Data

Personal Data will be used for specified purposes.

Use of Personal Data	Applicable Data Subject types
For complying with requests made by the Data Subject in which information is proactively shared with us	Partners, Customers, Subscribers, Visitors

For the completion of a contract in the purchase of goods or services from StraightForward	Customers
For the completion of a contract in the provision of services to StraightForward	Partners
For compliance with StraightForward's legal obligations	Partners, Customers, Subscribers, Visitors
For legitimate interest in customer service and support of our products, for example resolving customer issues	Customers
For legitimate interest in marketing and selling our products and services, for example in providing newsletters and offers to customers. Opt-outs will always be provided for Personal Data used in this way. Direct marketing for StraightForward is not provided by Partners	Customers, Subscribers, Visitors
For legitimate interest in continual improvement of activities in the course of StraightForward's business, for example in updating products and market segmentation. Automated decision-making is not used	Partners, Customers, Subscribers, Visitors

Data Sharing

Personal Data may be shared by Partners in the completion of applicable uses. Personal Data may be shared with Partners to achieve any of the applicable uses of Personal Data. This may include, but is not limited to sharing of:

- Cookies, analytics and service usage information with advertising Partners
- Details, delivery and transaction information with fulfilment Partners
- Payment information with payment Partners
- Other information as required

Partners will process and retain Personal Data in accordance with their own policies and processes. Where data is shared with Partners it will be managed through data sharing agreements.

Data Processing & Retention

StraightForward will retain Personal Data only where, and for as long as, an applicable use of that Personal Data exists. Upon review of Personal Data, which will happen at least annually, where an applicable use no longer exists, the data will either be deleted or anonymised to the extent it is no longer Personal Data.

StraightForward uses appropriate technical and organisational measures to ensure the security of Personal Data. Personal Data will not be shared with Partners other than for the specified uses and will never be sold.

Rights of Data Subjects

Data Subjects have rights affecting their Personal Data which may be exercised at any time by contacting StraightForward and verifying their identity. In exercising these rights, the Data Subject is forgoing any uses of these Personal Data which required it.

- Right to information and access - Data Subjects may view Personal Data held about them and the types and uses of that information in an easily understood format.
- Right to rectification - Data Subjects may rectify Personal Data held about them where that information is inaccurate
- Right to erasure - Data Subjects may erase Personal Data held by StraightForward where StraightForward's legal obligations does not require their retention
- Right to object and withdraw consent - Data Subjects may object to, or withdraw their consent for, the processing and use of their Personal Data for StriaightForward's legitimate interests.

Amendment

This policy may be reviewed and amended from time to time. Where changes are material, subjects of Personal Data held by StraightForward will be notified by publication on our websites and by email for those data subject categories where such information is held.

Contact Us

For queries or questions please contact:

StraightForward
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