

PRIVACY NOTICE

1. Who we are

We are Radina Radeva Fashion Ltd, trading as Radina Radeva, a limited company operating from 85 Great Portland street, First Floor, London.

We are a data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) and related data protection legislation.

2. How to contact us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Initial enquiries should be directed to Radina Radeva as follows:

- By email: radinaradevaclothing@gmail.com
- Online: www.radinaradeva.com

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 (www.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.

3. Privacy information

We are committed to protecting your personal data and your privacy. It is important that you read this privacy notice when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

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.

This version of our privacy notice was last updated on 08.04.2021

4. To whom does this privacy notice apply?

This privacy notice applies to:

- all individuals who purchase our goods from online shopping platforms;
- all individuals who visit our website www.radinaradeva.com (the **Website**);
- all individuals who communicate with us;

- all individuals who are our business contacts where you or your organisation supply goods or services to us, provide professional services, have expressed an interest in us or have any other business relationship with us (including where your organisation is a public authority, an industry body or regulatory authority or similar).

This privacy policy does not apply to employees, workers or other staff of Radina Radeva Fashion Ltd.

5. Information about our Website

Our Website may include 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. 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 policy of every website you visit.

6. About the personal data that we collect and process

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**).

The table set out in the schedule summarises the personal data we collect and process, how we use it (our processing purposes) and why we use it (the lawful bases for processing).

7. Children and special categories of personal data

We do not knowingly collect any personal data relating to children or special categories of personal data, including data relating to criminal convictions and offences.

8. How is your personal data obtained?

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

- **Direct interactions.** You may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you complete a form on our Website, have placed an order for our products, have purchased our products, give us feedback or otherwise contact us.
- **Direct interactions with business contacts.** You may give us your Identity, Contact, Financial, Transactional and other business related personal data when you correspond with us, including when you or your organisation provide services or products to us or your organisation receive products from us.

- **Third parties.** We will receive personal data about you from various third parties, and more particularly Identity, Contact, Transactional and Measurements data from online shopping platforms (such as etsy.com).

9. **Failure 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). In this case, we may have to cancel a product you have with us but we will notify you if this is the case at the time.

10. **With whom do we share your information**

We may have to share your personal data with third-party organisations to fulfil our contractual obligations with you and for you to be able to fully benefit from the products we offer.

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 third-party organisations 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.

11. **How long do we retain your personal data?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

12. **International data transfers**

We do not transfer your personal data out of the United Kingdom and the European Economic Area (EEA). Our domain and service providers might transfer your personal data elsewhere

according to their privacy policies. Please refer to the Wix and Mailerlite websites for their privacy policies.

13. Data security

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 the Information Commissioner's Office of a breach where we are legally required to do so.

14. Your rights

Your personal data is protected by legal rights, which include 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.
- **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; (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.

If you wish to exercise any of these rights, please contact us using the details above.

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.

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.

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.

You also have the right to complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.

SCHEDULE

Personal data will be processed by us where that processing is necessary for: 1) the performance of a contractual obligation with you; or (2) compliance with a legal obligation to which we are subject; or (3) the purposes of our legitimate interests (or those of a third party).

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to marketing communications.

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.

Whose personal data?	What type of personal data we collect?	How do we use your personal data?	Why do we use your personal data (what is the lawful basis)?
Website users	(a) Identity data Name (b) Contact data E-mail address	To respond to general and specific queries. To improve the website user experience. To communicate website and company updates with you.	Necessary for our legitimate interests (to correspond with people who have interest in us or would like to purchase our products).
Individuals who purchase our goods Individuals who communicate with us	(c) Identity data (i.e. title, name, surname, date of birth, gender) (d) Contact data (i.e. delivery address, email address, telephone) (e) Transactional data details about payments	To process and deliver products to you including: (a) Providing information about our products; (b) Executing orders for our	Necessary for the performance of a contractual obligation with you. Necessary for our legitimate interests (or those of a third party).

	<p>to and from you and other details of products you have purchased from us or from a third-party online shopping platform</p> <p>(f) Measurements data Details of various body measurements</p>	<p>products;</p> <p>(c) Dealing with any complaints and receiving feedback;</p> <p>(d) Notifying you about changes in relation to your orders;</p> <p>(e) Notifying you about website and company updates.</p> <p>To manage our relationship with you.</p>	
Business contacts	<p>(a) Identity data (i.e. title, name, surname, date of birth, gender)</p> <p>(b) Contact data (i.e. delivery address, email address, telephone)</p> <p>(c) Employment data (i.e. job title, employer, credentials)</p> <p>(d) Transactional data details about payments to and from you and other details of products you have purchased from us or from a third-party online shopping platform</p>	<p>To manage our business relationships with suppliers, partners, online purchasing platforms, professional advisors, public authorities and others.</p>	<p>Necessary for our legitimate interests (or those of a third party).</p> <p>Necessary for the performance of a contractual obligation with you.</p>
All data subjects	All personal data	<p>To protect our privacy, property, rights of third parties, safety of our staff or our customers.</p> <p>To exercise or defend our legal rights.</p>	<p>Necessary for compliance with a legal obligation to which we are subject</p>

