



LUXURY SPA PRODUCTS *for* HANDS, FEET & BODY

## PRIVACY & DATA POLICY

### DEFINITIONS

In this Privacy & Data Policy "the Seller" means Cuccio Europe or any subsidiary or associated business. The "Buyer" means the purchaser of goods from the Seller under the Seller's terms and conditions.

This policy sets out the basis on which we collect and process your personal data through your use of our website and/or signing up for newsletters, competitions and other marketing activities online.

Any changes we make to this policy in the future will be posted on this page and, if appropriate, notified to you by email so please check this page regularly.

### INFORMATION ABOUT US

Cuccio Europe is the controller responsible for your personal data (referred to as "we", "us" or "our" in this Privacy & Data Policy). Our registered office is at Unit 9 Sandstone Court, Bulwell, Nottinghamshire, NG6 8NN, England. If you have any questions about this privacy policy, the use of your personal information, or your dealings with our website, you can contact us at [Info@Cucciobeauty.co.uk](mailto:Info@Cucciobeauty.co.uk).

### YOUR PERSONAL DATA

#### Information you provide to us

You will provide some or all of the following information to us when you purchase goods from our website, register a customer account with us, contact us, or sign up for newsletters and other marketing activities online:

- *Your Identity and Contact Details* - includes your name, email address, home postal address/billing address, delivery address (if different), and your contact telephone number
- *Your Payment Details* - your bank details and payment card details
- *Your Profile Data* - if you register a customer account, this includes the profile you create to identify yourself when connecting to our website (including your username and password) and other data about purchases and your personal preferences.

*Please Note:* It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

We do not collect any categories of sensitive personal data and this website is not intended for children so we do not knowingly collect data relating to children.

#### Information we collect when you use our website

As you interact with our website, we also automatically collect usage and technical data (described below) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- Usage Data - includes details of products and services you have purchased from us, and information about how you use our website
- Technical Data - includes: Your Internet protocol (IP) address, 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, information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times,

- download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page, mobile applications traffic data, weblogs and other communication data;
- Other - We may also receive information from third parties we work closely with such as delivery services, credit reference agencies and fraud prevention agencies.

### **What we use your personal data for**

Data protection law in the UK allows us to collect, use, store and transfer personal information if we have one or more of the following purposes for doing so:

- To fulfil a contract with you
- Where necessary to comply with a legal or regulatory obligation
- Where necessary for our legitimate interests (or those of a third party) provided your interests and fundamental rights do not override these interests
- For other reasons where you have expressly consented to those purposes.

Below are the ways we will use your personal data to fulfil your contract and/or for our legitimate interests:

- Processing your order, including taking payment, supplying products and any after sales services such as cancellations and returns
- Identify verification and credit checking
- Keeping you updated on the progress of your order, we may communicate with you about your order by email, but we or our couriers may also contact you by phone or text
- Where you have registered with us, processing and administering your account
- Processing information required for competition, promotion or survey entries by you
- Allowing you to participate in interactive features of our service if you choose to do so
- Analysing sales to help us understand and improve our business
- Administration, analysis and assessment of our websites and their performance, to understand and develop our business and for the improvement and optimisation of our websites and as part of our efforts to keep our websites safe and secure.

### **Direct Marketing**

We need your consent for direct marketing communications. If you have expressly given your consent to receive direct marketing from us via our website, we may use the information you have given us for:

- Delivering direct marketing, advertising and updates from us to you, such as telling you about forthcoming events, products, services and offers and updates and information about us
- Measuring and understanding the effectiveness of advertising we serve to you and others
- Making suggestions and recommendations to you and other users of our websites about goods or services that may interest you or them.

At any time you can opt out of direct marketing or change your preferences.

### **Cookies**

We need your consent for our use of cookies. You have the right to withdraw your consent.

### **Who we share your data with**

We may share your information within Cuccio Europe and with our selected third parties for the purposes referred to above. For example:

- Payment Acquiring Services to process your payment
- Delivery and Courier Companies to supply your order
- Credit Reference & Fraud Prevention Agencies for credit checking and identity verification
- Analytics and search engine providers that assist us in the improvement and optimisation of our website

- Build and hosting service providers that help us to maintain the software that runs our website. They provide us with reporting statistics and serve cookies on our behalf to enable any website personalisation and sign-in functionality.

We require all third parties engaged by us to respect the security of your personal data and to treat it in accordance with the law. Such third parties are only allowed to process your personal data in accordance with our instructions, and not for their own purposes.

### **Payment by Klarna**

In order to offer our Customers Klarna's payment options we will pass to Klarna certain aspects of your personal information (such as contact and order details) in order for Klarna to assess whether you qualify for their payment options and for them to tailor the payment options for you.

You can find general information on Klarna [here](#). Your personal data is handled in accordance with applicable data protection law and in accordance with information in [Klarna's privacy policy](#).

### **Opting out of marketing and preference updates**

If you no longer wish to receive direct marketing and updates from Cuccio Europe you can unsubscribe at any time by clicking on the link in the footer of the email or using the 'unsubscribe from all' link within the email preference centre accessible through the emails. Alternatively, you can contact customer services on +44 (0) 115 9753656 or email [Info@Cucciobeauty.co.uk](mailto:Info@Cucciobeauty.co.uk). If you are a registered online customer you can also opt out and amend your preference settings within your login profile under "My Account".

### **Security of your personal data**

Our websites have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. All information you provide to us is stored on secure servers. We have also put in place procedures to deal with any suspected personal data breach.

Where you have chosen a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you to choose an effective, secure password and not to share your password with anyone.

We recommend only connecting to secure wireless networks that you trust to reduce the risk of unauthorised people intercepting your online activity. Beware of the risks of using public Wi-Fi.

If you receive an email purporting to be from Cuccio Europe asking for personal data, please do not respond to the email but please let us know that this has happened so we can check whether the email is genuine.

### **How long we keep your personal data**

We will keep your data for as long as you are a customer and thereafter we may keep it for longer in order to respond to any questions or complaints and to maintain necessary records to satisfy legal, accounting or reporting requirements. We may also keep your data for research or statistical purposes.

### **YOUR RIGHTS**

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using it if there is no need for us to keep it. Please let us know if you think we should not be using it, but please be aware that there may be legal or other official reasons why we need to keep or use your information.

Your rights under data protection laws in relation to your personal data are briefly summarised below, and you can exercise these rights by emailing us at [Info@Cucciobeauty.co.uk](mailto:Info@Cucciobeauty.co.uk) or by writing to us at Customer Services Dept. Cuccio Europe, Unit 9 Sandstone Court, Bulwell, Nottinghamshire, NG6 8NN England:

- 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. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which we will tell you about, if applicable, after receiving 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.
- Request restriction of processing of your personal data. You can 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. Please 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 if we are relying on your consent to process your personal data. This won't affect any processing already carried out before you withdraw your consent or processing under other grounds. If you withdraw your consent, we may not be able to provide certain products or services to 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.

You will not have to pay a fee to access your personal data and we try to respond to all requests within one month.

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](http://www.ico.org.uk)). However, we would appreciate the chance to deal with any concerns you may have before you approach the ICO so please contact us in the first instance. If you have any questions or require any more information please contact us at [Info@CuccioBeauty.co.uk](mailto:Info@CuccioBeauty.co.uk)

**Please refer directly to Cuccio Europe or visit the website at [www.cuccioeurope.co.uk](http://www.cuccioeurope.co.uk) for full Terms of Business.**