

PRIVACY POLICY – WRV Companies Ltd

The Company purports to maintain a secured, safe and protected environment digitally to its users by ensuring stringent compliance with the legal requirements. Below-mentioned is the detailed list of provisions entailing under the privacy policies.

Section 1 - Personal Information

1.1 Account

1.1.1 It is pertinently stated by way of the company's website that, any and every purchase can only be made subsequent to opening of an online personal account. During the process of account creation, in lieu of the sale-purchase arrangement, the Company persists to collect the following data recognized as personal information:

- a. First and Last Name of the User;
- b. Home and/or Invoice Address;
- c. Telephone Number;
- d. Gender;
- e. IP Address;
- f. E-mail address;
- g. Date of Birth.

1.1.2 Additionally, when the user starts to browse the digital store through their respective computers, the Company receives the user's IP address based on which they tend to curate the online experience whilst ensuring data protection.

1.1.3 Purpose of Data Collection

The above-mentioned data is collected for the following purposes:

- a. Fulfil every obligation created by way of contractual relation between the parties and to ensure providing with the relevant information, products and/or services as requested.
- b. Setting up, efficient management and contact details of every account and orders.
- c. Carrying out market research and analysis.
- d. To confirm and secure age and identity in order to prevent fraudulent business transactions.

1.2 Electronic Newsletters

1.2.1 Newsletters are a part and parcel of every company's promotional and customer service segment. Any user has the right to either approve and/or deny of receiving newsletters on a timely basis laying descriptive and detailed information about the store, new products, new launches, offers (if any) and any other relevant information.

1.2.2 In the process of seeking approval, the Company pertains to collect the following information:

- a. First and Last Name of the User;
- b. Gender; and
- c. Email Address.

1.2.3 Purpose of Data Collection

The data collected in the pursuit of this sub-section is used to customize the emails including providing a gender-specific content. The Company also authorizes the user to have the authority to withdraw the consent at any time the content is not feasible or useful or of any benefit to you.

1.3 Customer Services

All the above information sought by the Company is for them to ensure laying an appropriate, structured and effective customer support to the users through its employees who shall also have limited access to the information provided, that is, only up to the extent of communicating with the users. Such data is also used and procured by the CRM provider Super Office at the Company which is only to be used for responding to the messages and/or queries.

Section 2 – Consent

- 2.1 It is noted that the user provides with an implied consent to their personal information related to payment as and when he/she completes a payment transaction, verifies his/her credit card, places an order, arranges a delivery and/or returns a purchase made earlier.
- 2.2 Please be aware that if any such information is sought by the Company for any secondary reason, the user will be vested with an opportunity to approve or refuse such details.
- 2.3 **Withdrawing consent**
Under any circumstances or by way of any reasonable reason as deemed fit by the user, the user no longer wants to receive the services of the company and/or desires for their information to be disclosed, the user has the opportunity to withdraw their opt-in consent by contacting the support desk having its email as info@wrvcompanies.co.uk.

Section 3 – Exceptions to Non-Disclosure and Confidentiality

The Company reserves the right to not abide by non-disclosure and/or confidentiality clause as per the underlined policy in the following circumstances:

- 3.1 to the extent that such Confidential Information is already in the public domain, other than by breach of this Agreement;
- 3.2 to the extent that such Confidential Information is required to be disclosed by any applicable law or any applicable regulatory requirements or by any regulatory body to be disclosed;

- 3.3 in so far as it is disclosed to the employees, directors, partner, financiers or professional advisers of the Company, provided that the Company shall procure that such persons treat such Confidential Information as confidential; and
- 3.4 to the extent that any of such Confidential Information was previously known or already in the lawful possession of the Company, prior to disclosure by the user.

Section 4 – Data Retention

4.1 The Company persists to retain the data of any individual for a time period till it serves and fulfils the purpose of delivering its services and products to the users.

4.2 The Company holds no data longer than a period of ten years related to any individual.

4.3 As far as the account information is concerned, the time a user tends to remove and/or permanently delete his/her account with the Company, the data retained by the company shall be deleted from its data base within a reasonable time period. The user can also send any request seeking inspection and/or correction of data stored at the helpdesk of the company, that is, info@wrvcompanies.co.uk.

4.4 Any data related to the periodically delivered newsletters is also retained only up to the time, such individual intends to receive the same. However, as soon as they unsubscribe to it, the data shall be removed. The users also reserve an option to opt-out of the function by consenting to the same.

Section 5 – Cookies Policy

A “cookie” is a string of information which assigns the user a unique identifier that the Company stores on their computer. The browser then provides that unique identifier to use each time the user submits a query to the Site. The Company uses cookies on the Site to, among other things, keep track of services used, record registration information, record user preferences, keep the user logged into the Site, facilitate purchase procedures, and track the pages visited. Cookies help the Company understand how the Site is being used and improve user experience. The Company uses two kinds of Cookies, which are:

- a. Functional Cookies
This is adopted by the Company to enhance the user’s experience and keep a track on the respective shopping carts of the users. These do not require any prior permission.
- b. Analytical Cookies
These cookies are used to structure relevant and required market research and analysis. The data compiled through this is anonymized and the use requires no prior permission.

Section 6 – Third-Party Services

- 6.1 The Company makes use of various third-party services to fulfil the business transactions requested by the users and perform their obligations.
- 6.2 The personal information is disclosed to such parties only to the extent required by them to perform the services requested by the users.
- 6.3 In certain circumstances, the third-party service provider or the facility have their own personal privacy policy curated or located in a different jurisdiction, hence, the user shall be aware that under this situation, they become subject to the laws and regulations of their own jurisdiction and/or policies as well.
- 6.4 Web analysis is the process undertaken to gather, collect and analyze data regarding the behavior of visitors to the websites. It lays down the sub-pages visited, frequency of viewing the relevant pages, optimization of data and a cost-benefit analysis of the promotional activities.
- 6.5 Courier services are used to deliver the products from the company to the consumer's/ user's address. To fulfil the said obligation, the Company requires access to the relevant information about name and address of the user.
- 6.6 The Company also makes use of an external mail service provider to provide with the newsletters and this gives these service providers limited access to the information.
- 6.7 It is to be noted that Company seeks aid from specialized marketing and communication companies to achieve its goals of marketability and growth. Such data is limited in scope and mostly anonymous.
- 6.8 The Company receives payment with the help and assistance of external payment services and/or gateways.
- 6.9 Third-party cookies may be place on the user's computer when they visit the Site by companies that run certain services offered. These cookies allow the third parties to gather and track certain information about the user. These cookies can be manually disabled in the user's browser.

Section 7 – Security and Data Protection

- 7.1 The Company undertakes reasonable, necessary and efficient precautionary measures to follow the best practices and ensure data protection to the individuals.
- 7.2 The credit card information so received by the Company during payment is encrypted using secured Socket Layer Technology (SLT) and stored with a valid AES-256 encryption.

7.3 The Company also follows a PCI-DSS requirement for implementing additional security during data transmission.

7.4 All the information related to the personal account of the individual is protected through a hashing method wherein information is transformed into a hash and the same is sensitive and invisible to the Company.

7.5 The data received is anonymized to the utmost extent to ensure safety and security to the users.

7.6 The employees of the Company are also provided with a limited access to the personal information of the users and every usage is monitored through stringent surveillance.

7.7 Strict and regulated security manager is undertaken to ensure efficient applicability of the security measures.

Section 8 – Notices

For any purpose, grievance and/or query not addressed by the underlined policy can be raised through an email at the support helpline, that is, info@wrvcompanies.co.uk

Section 9 - Amendments

Any amendment, modification or addition to this Agreement shall be effective or binding on the user hereto unless set forth in writing and executed by them through their duly authorized representatives; and subject to obtaining requisite approvals, if any, following such execution. Please ensure reviewing the policies in a timely manner so as to be aware of the changes, upgradation and disclosures.