
PRIVACY POLICY

INTRODUCTION

Welcome to Just's privacy policy.

Just understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, just-dm.co.uk ("**Our Site**"), and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under applicable law.

This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). Please read this privacy policy carefully and ensure that you understand it. By providing your personal data to us, you acknowledge and agree that you have fully read and understood this policy, and consent to the collection, use, processing and disclosure of your personal data as described in this policy.

1. Important Information

- (a) This privacy policy aims to give you information on how Just collects and processes your personal data through your use of this website, including any data you may provide through this website when you set up an account, access materials or purchase a product.
- (b) This website is not intended for children and we do not knowingly collect data relating to children under the age of 18.
- (c) It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any other notices and policies and is not intended to override them.

2. Information About Us

- (a) Our Site is owned and operated by Just Digital Marketplace Ltd (trading as Just), a private company limited by shares registered in England and Wales under company number 12146925 whose registered office is at c/o Smith and Williamson LLP, Portwall Place, Portwall Lane, Bristol, BS1 6NA.
- (b) We are authorised by the Ministry of Justice Lord Chancellor's department.
- (c) These terms of use are issued on behalf of Arum Holdings (JWL) Limited, trading as Just, so when we mention "Just", "we", "us" or "our" in these terms of use, we are referring to Just Digital Marketplace Ltd, trading as Just.
- (d) Just Digital Marketplace Ltd is the controller and responsible for this website.

- (e) We have appointed a data privacy manager 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 to such personal data, please contact the data privacy manager using the details set out below.

Name or title of data privacy manager:	Chris Badger
Email address:	cb@just-dm.co.uk
Postal address:	Thomas House, 84 Eccleston Square, London, SW1V 1PX
Telephone number:	020 3848 9060

3. What Does This Policy Cover?

This privacy policy applies only to your use of Our Site. Our Site may contain links to other websites, plug-ins and applications. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them. We do not control these third-party websites and are not responsible for their privacy statements.

4. What Is Personal Data?

- (a) Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.
- (b) Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. It does not include data where the identity has been removed (anonymised data).

5. What Data Do We Collect?

- (a) Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any ‘special category’, ‘sensitive’ personal data, personal data relating to children or data relating to criminal convictions and/or offences.
- (i) Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- (ii) Contact Data includes billing address, delivery address, email address and telephone numbers.

- (iii) Financial Data includes bank account and payment card details.
 - (iv) Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
 - (v) Technical Data 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.
 - (vi) Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - (vii) Usage Data includes information about how you use our website, products and services.
 - (viii) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (b) We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage information to calculate the percentage of users accessing a specific feature on our Site. 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 policy.
- (c) 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.
- (d) 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. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

6. How is your personal data collected?

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

- (a) **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:
- (i) apply for our products or services;

- (ii) create an account on our website;
 - (iii) subscribe to our service or publications;
 - (iv) request marketing to be sent to you; or
 - (v) give us some feedback.
- (b) **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.

7. How Do We Use Your Personal Data?

- (a) Under the Data Protection Legislation, we must always have a lawful basis for using personal data. Most commonly we will use your personal data in the following circumstances:
- (i) Where we need to perform the contract we are about to enter into or have entered into (performance of a contract);
 - (ii) Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (legitimate interest); or
 - (iii) Where we need to comply with a legal obligation (compliance with a legal obligation).
- (b) **Performance of Contract** is 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 with us.
- (c) **Legitimate Interest** is the interest of our business in conducting and managing our business to enable us to give you the best service 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 using the details in Part 2.
- (d) **Compliance with a legal obligation** is processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

- (e) Generally we do not rely on consent as a legal basis for processing your personal data although we will get your consent before 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 in accordance with Part 2. The following table describes how we may use your personal data, and our lawful bases for doing so. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

8. Purposes for which we will use your personal data

- (a) 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.
- (b) 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.

What We Do	What Data We Use	Our Lawful Basis(es)
Registering you on Our Site.	(a) Identity (b) Contact	Performance of a contract with you
Providing and managing your account on Our Site.	(a) Identity (b) Contact (c) Profile (d) Technical.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests.
Providing and managing your access to Our Site.	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Usage (f) Technical (g) Marketing and Communications.	Necessary for our legitimate interests.
Personalising and tailoring your experience on Our Site.	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Usage (f) Technical (g) Marketing and Communications.	Necessary for our legitimate interests.
Administering Our Site.	(a) Identity (b) Contact (c) Usage (d) Technical.	(a) Necessary for our legitimate interests. (b) Necessary to comply with a legal

		obligations.
Administering our business.	(a) Identity (b) Contact (c) Usage (d) Technical.	(a) Necessary for our legitimate interests. (b) Necessary to comply with a legal obligation.
Supplying our services to you.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you. (b) Necessary for our legitimate interests.
Managing payments for our services.	(a) Identity (b) Contact (c) Financial (d) Transaction.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests.
Personalising and tailoring our services for you.	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Usage (f) Technical (g) Marketing and Communications.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests. (c) Necessary to comply with a legal obligation.
Communicating with you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications.	(a) Performance of a contract with you. (b) Necessary for our legitimate interests. (c) Necessary to comply with a legal obligation.
Supplying you with information by email and post that you have opted-in-to (you may opt-out at any time by contacting the DPO.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications.	Necessary for our legitimate interests. .

- (c) With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to protect your rights fully and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out by contacting us.

- (d) Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Part 10. Please refer to Part 10 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.
- (e) We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably consider that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 2.
- (f) If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.
- (g) In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. How Long Will We Keep Your Personal Data?

- (a) We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, 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 of our relationship to you.
- (b) 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.
- (c) By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction information) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data. See Part 11 for further information.
- (d) In some circumstances we will 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.

10. How and Where Do We Store or Transfer Your Personal Data?

- (a) We may have to share your personal data with **External Third Parties** meaning:
 - (i) service providers based in the UK who provide payment, book-keeping, accountancy, IT and system administration services;

- (ii) professional advisers acting as processors or joint controllers including accountants and auditors based in the UK who provide accounting and book-keeping services;
 - (iii) HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- (b) If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this privacy policy.
- (c) In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- (d) We will store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.
- (e) We may store or transfer some of your personal data within the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR and/or to equivalent standards by law.
- (f) We may store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:
 - (i) we may share your data with affiliated companies or any company that forms part of our corporate group. This may involve the transfer of personal data outside the EEA and whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it that would apply under the Data Protection Legislation. Just ensures that personal data is protected by requiring all companies to which it is affiliated or otherwise grouped to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).
 - (ii) we may share your data with external third parties, as detailed above, that are based outside of the EEA. The following safeguards are applied to such transfers:
 - we will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#);

- we use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#); and
 - where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).
- (g) Please contact us using the details below in Part 2 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.
- (h) 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.
- (i) The security of your personal data is essential to us, and to protect your data we take a number of important measures, including the following:
- (i) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
 - (ii) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

11. What Are Your Rights?

- (a) Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:
- (vi) **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.
 - (vii) **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.
 - (viii) **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.

- (ix) **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.
 - (x) **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.
 - (xi) **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.
 - (xii) **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.
- (b) If you wish to exercise any of the rights set out above, please contact us.
- (c) **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.

- (d) **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.
- (e) **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.

12. How Can You Control Your Personal Data?

- (a) In addition to your rights under the Data Protection Legislation, set out in Part 11, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and/or by contacting the data protection manager at the point of providing your details).
- (b) You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

13. Can You Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies. For more information, see Part 14.

14. How Do We Use Cookies?

- (a) A Cookie is a small text/data file that is sent to your computer when you visit a website. Cookies collect information about users, such as their names, addresses, email, passwords and user preferences. When you visit the website again the cookie allows that site to recognise your browser. Whilst Cookies and the information they transmit may not identify an individual on their own, they may be able to do so in combination with other information held by us or a third party.
- (b) We use the following cookies:
 - (i) **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to

log into secure areas of our website, use a shopping cart or make use of e-billing services.

- (ii) **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - (iii) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - (iv) **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- (c) You may, if you wish, deny consent to the placing of Cookies, however certain features of Our Site may not function fully or as intended.
 - (d) In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose if you wish to disable Cookies. By default, most internet browsers accept Cookies, but this can be changed. Please consult the help menu in your internet browser or the documentation that came with your device.
 - (e) You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

15. **Changes to this Privacy Policy**

- (a) We may change this policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.
- (b) We will notify you where there is a change in processing purpose, identity of controller or how you can exercise your rights. Any other changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the privacy policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.
- (c) This privacy policy was last updated on 28 August 2019.