
BENEKO MARKETPLACE PRIVACY POLICY

BENEKO MARKETPLACE OPERATOR

Business name:	BENEKO.COM LLP
Registered office:	The Business Resource Network, 53 Whateley's Drive, Kenilworth, Warwickshire, CV8 2GY, United Kingdom
Company number:	OC427952
Registered in:	The Registrar of Companies for England and Wales
Contact:	
a) Email address:	info@beneko.com
b) Postal address:	Beneko.com LLP, The Business Resource Network, 53 Whateley's Drive, Kenilworth, Warwickshire, CV8 2GY, United Kingdom
c) Telephone number:	+4402034995172
e) Data protection officer:	gdpr@beneko.com

(hereinafter referred to as the "**Operator**")

I. INTRODUCTION

1. This privacy policy provides you with details of how we collect and process your personal data through your use of our site and additional mobile application.
2. By providing us with your data, you warrant to us that you are over 13 years of age.
3. This Beneko Marketplace Privacy Policy (hereinafter referred to as the "**Privacy Policy**") are issued by BENEKO.COM LLP, stated in the heading of this Privacy Policy, as the data controller and entity responsible for your personal data processed on the basis of your use of the Beneko Marketplace website, available at "<https://beneko.com/>" and also, to use the "BENEKO APP", mobile application created and operated by BENEKO.COM LLP with intention to provide additional services for Users of Beneko Marketplace. The purpose of this Privacy Policy is to inform you about what personal data we process, in particular about our customers, users of our website and retailers, based on which legal grounds we process personal data, for what purposes we use them, who we can hand them over to and what rights you have in connection with the processing of your personal data.
4. It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by calling us or emailing us at the contact details stated in the heading of this Privacy Policy or by updating your personal details in your account in BENEKO MARKETPLACE or BENEKO APP.
5. This Privacy Policy constitute a part of the Special Terms and Conditions of Using the Portal under Article I (3) of the Terms and Conditions of Use for Beneko Marketplace websites, available at is <https://beneko.com/gbc> hereinafter referred to as the "**Conditions of Use**").

II. WHAT DATA WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

1. Personal data means any information capable of identifying an individual. It does not include anonymized data.

2. We may process the following categories of personal data about you:
 - (a) **Communication Data.** Communication Data includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us, including communication via mobile applications (e.g. via “BESTCENA APP”). We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims;
 - (b) **Customer Data.** Customer Data includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract;
 - (c) **User Data.** User Data includes data about how you use our website, mobile application and any online services together with any data that you post for publication on our website, mobile application or through other online services. We process this data to operate our website and/or mobile application and ensure relevant content is provided to you, to ensure the security of our website and mobile application, to maintain back-ups of our website, mobile application and/or databases and to enable publication and administration of our website, mobile application and other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website, mobile application and our business;
 - (d) **Technical Data.** Technical Data includes data about your use of our website, mobile application and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website or mobile application, page views and navigation paths, details about the number of times you use our website or mobile application, time zone settings and other technology on the devices you use to access our website or mobile application. The source of this data is from our analytics tracking system. We process this data to analyze your use of our website, mobile application and other online services, to administer and protect our business, website and mobile application, to deliver relevant website/app content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website, mobile application and our business and to grow our business and to decide our marketing strategy;
 - (e) **Marketing Data.** Marketing Data includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website/app content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
3. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website/app content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).
4. **Sensitive Data.** We do not collect any Sensitive Data about you. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.
5. Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

6. We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at gdpr@beneko.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.
7. We may process your personal data without your knowledge or consent where this is required or permitted by law.
8. We do not carry out automated decision making or any type of automated profiling.

III.

HOW WE COLLECT YOUR PERSONAL DATA

1. We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website or mobile application by using cookies and similar technologies. Please see our cookie policy for more details about this <https://beneko.com/cookie-policy>.
2. We may receive data from third parties such as analytics providers, advertising networks, search information providers, providers of technical, payment and delivery services.
3. We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

IV.

MARKETING COMMUNICATIONS

1. Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).
2. Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.
3. You can ask us or third parties to stop sending you marketing messages at any time by:
 - (a) logging into the website or mobile application and checking or unchecking relevant boxes to adjust your marketing preferences; or by
 - (b) following the opt-out links on any marketing message sent to you; or by
 - (c) emailing us at info@beneko.com at any time.
4. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

V.

DISCLOSURES OF YOUR PERSONAL DATA

1. We may have to share your personal data with the parties set out below:
 - (a) other companies in our group who provide services to us;
 - (b) service providers who provide IT and system administration services;
 - (c) professional advisers including lawyers, bankers, auditors and insurers;
 - (d) government bodies that require us to report processing activities;
 - (e) third parties to whom we sell, transfer, or merge parts of our business or our assets.
2. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

VI.

DATA SECURITY

1. We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.
2. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.
3. We do not transfer your personal data outside the European Economic Area (EEA).

VII.

DATA RETENTION

1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
2. When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.
3. For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.
4. In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

VIII.

YOUR LEGAL RIGHTS

1. Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.
2. You can see more about these rights at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> or https://edps.europa.eu/data-protection/our-work/subjects/rights-individual_en.
3. If you wish to exercise any of the rights set out above, please email us at **gdpr@beneko.com**.
4. 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 or refuse to comply with your request in these circumstances.
5. 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.
6. 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 several requests. In this case, we will notify you.
7. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or The European Data Protection Supervisor (EDPS), the European Union's independent data protection authority (<https://edps.europa.eu/>). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

IX.

THIRD-PARTY LINKS AND COOKIES

1. This website or "BENEKO APP" mobile application 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 notice of every website you visit

2. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://beneko.com/cookie-policy>.