Privacy Notice

1. Introduction

The Peel Group respects your privacy and is committed to protecting your personal data. This privacy notice explains how we look after your personal data when you visit our website or correspond with us by email. It sets out your privacy rights and how the law protects you.

Please read this notice carefully alongside any other privacy notice we provide on specific occasions when collecting or processing personal data about you.

2. Who We Are (Controller)

This privacy notice is issued on behalf of the Peel Group. When we refer to, "we", "us" or "our", we mean the relevant Peel Group company responsible for processing your data. A list of the Peel Group companies covered by this privacy notice is available on our website at https://www.peel.co.uk/peel-group-entities.

We have appointed a Data Privacy Manager who is responsible for overseeing questions relating to this notice. For any queries, including requests to exercise your legal rights or to raise a complaint, please contact:

Peel Group Management UK Limited
Data Protection
Venus Building, 1 Old Park Lane, Trafford City, Manchester, M41 7HA
Email: dataprotection@peel.co.uk
Telephone: 0161 629 8200

3. Your Right to Complain

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 opportunity to address your concerns before you approach the ICO, so please contact us first.

3.1 Our Complaints Process (DUAA 2025)

Under the Data (Use and Access) Act 2025, we are required to maintain a formal complaints process for data protection matters. You may raise a complaint with us by contacting dataprotection@peel.co.uk. We will:

- Acknowledge your complaint promptly.
- Investigate your complaint fairly and thoroughly.
- Respond with the outcome of our review in accordance with applicable data protection law.

- Inform you of your right to escalate to the ICO if you remain dissatisfied.

This complaints process does not affect your right to lodge a complaint directly with the ICO at any time.

4. Data (Use and Access) Act 2025

The Data (Use and Access) Act 2025 (DUAA) amends the UK GDPR, the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations. It does not replace those laws, but clarifies and updates certain requirements, including in relation to:

- Subject access requests ("reasonable and proportionate" searches and the ability to pause the response clock when seeking clarification).
- Automated decision-making (updated transparency and safeguarding obligations).
- Cookies and similar technologies (relaxation of consent requirements for certain statistical and functional cookies where an opt-out is available).
- International data transfers (updated transfer mechanisms).
- Recognised legitimate interests (a new legal basis for certain specified processing activities, removing the requirement for a balancing test in those cases).
- Children's higher protection matters (new obligations for services likely to be accessed by children).

Where these changes apply to our processing activities, we will continue to process your personal data fairly, lawfully, and transparently. If you have questions about how these changes affect your personal data, please contact us at dataprotection@peel.co.uk.

5. The Data We Collect About You

Personal data means any information about an individual from which that person can be identified. It does not include anonymised data.

We may collect, use, store and transfer the following categories of personal data:

- Identity Data: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data: billing address, delivery address, email address and telephone numbers.
- Financial Data: bank account and payment card details.
- Transaction Data: details about payments to and from you and other details of products and services purchased from us.

- Technical Data: IP address, 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 your devices.
- Profile Data: your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data: information about how you use our website, products and services.
- Marketing and Communications Data: your preferences in receiving marketing from us and our third parties, and your communication preferences.

We may also collect, use and share Aggregated Data (statistical or demographic data) for any purpose. Where Aggregated Data is combined with personal data so that it directly or indirectly identifies you, we treat it as personal data.

5.1 Special Category Data

We do not intentionally collect Special Category Personal Data (which includes data about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, genetic or biometric data) through our website or general email correspondence. We also do not intentionally collect information about criminal convictions and offences. If you voluntarily provide such data, we will only process it were permitted by law.

5.2 Children's Data (DUAA 2025)

Our website is not intended for children under 18. We do not knowingly collect personal data from children. Under the DUAA 2025, where a service is likely to be accessed by children, controllers must consider children's higher protection matters, including the fact that children may be less aware of the risks associated with data processing. If you believe we have inadvertently collected data about a child, please contact us immediately at dataprotection@peel.co.uk.

5.3 Failure to Provide Personal Data

Where we need to collect personal data by law or under a contract with you and you fail to provide it when requested, we may not be able to perform the contract. In that case, we may have to cancel a product or service, and we will notify you.

6. How Is Your Personal Data Collected?

We use the following methods to collect personal data:

- Direct interactions: You may give us your Identity, Contact and Financial Data by filling in forms or corresponding with us by post, phone, email or otherwise.

- Automated technologies or interactions: As you interact with our website, we may automatically collect Technical Data using cookies, server logs and similar technologies. Please see our Cookie Policy for details.
- Third parties and public sources: We may receive personal data from analytics providers (e.g. Google), advertising networks, search information providers, payment and delivery providers, data brokers, and publicly available sources such as Companies House and the Electoral Register.

7. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use it:

- Where we need to perform a contract we are about to enter or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and those interests are not overridden by your rights and interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have recognised legitimate interests under the DUAA 2025 (for certain specified processing activities such as preventing fraud, intra-group data sharing for administrative purposes, and network/information security).

We do not rely on consent as our primary lawful basis except where required by law, including for certain direct marketing by email or text message and for non-essential cookies. Where we rely on consent, you may withdraw it at any time by contacting us using the details above or opting out by updating your preferences on our website.

7.1 Automated Decision-Making (DUAA 2025)

We do not use solely automated decision-making that produces legal or similarly significant effects on you. If this changes, we will update this notice and provide you with:

- Clear information about the logic involved in any automated decision-making.
- The significance and likely consequences of such processing.
- The safeguards available to you, including the right to request human review, to express your point of view, and to contest the decision.

We will carry out a Data Protection Impact Assessment before implementing any such automated decision-making.

8. Purposes for Which We Use Your Personal Data

The table below sets out all the ways we plan to use your personal data and the legal basis we rely on.

Purpose/Activity	Type of Data	Lawful Basis
Register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
Process and deliver your order; manage payments and recover debts	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Comms	(a) Performance of a contract (b) Legitimate interests (debt recovery)
Manage our relationship with you including notifying you of changes, reviews and surveys	(a) Identity (b) Contact (c) Profile (d) Marketing & Comms	(a) Performance of a contract (b) Legal obligation (c) Legitimate interests (record keeping, customer insight)
Enable you to enter prize draws, competitions or surveys	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Comms	(a) Performance of a contract (b) Legitimate interests (business development)
Administer and protect our business and website (including troubleshooting, testing, hosting)	(a) Identity (b) Contact (c) Technical	(a) Legitimate interests (IT services, network security, fraud prevention) (b) Legal obligation
Deliver relevant content and advertising and measure effectiveness	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Comms (f) Technical	Legitimate interests (business growth, marketing strategy)
Data analytics to improve our website, products, marketing	(a) Technical (b) Usage	Legitimate interests (business development, website improvement)

Purpose/Activity	Type of Data	Lawful Basis
and customer experience		
Make suggestions and recommendations about goods or services likely to interest you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Legitimate interests (product and service development)

9. Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to determine what products, services and offers may be relevant for you.

You may receive marketing from us were permitted by applicable law: where you have requested information, purchased from us, or given consent. You may opt out at any time by contacting us or updating your preferences on our website.

9.1 Third-Party Marketing

We will obtain your express opt-in consent before sharing your personal data with any third-party company outside the Peel Group for marketing purposes. We will tell you who those companies are at the time you consent.

9.2 Opting Out

You may ask us to stop sending marketing messages at any time by logging into our website or by contacting us using the details in Section 2. Opting out of marketing will not affect personal data provided in connection with a product or service purchase or other transaction.

10. Cookies

You can set your browser to refuse all or some cookies, or to alert you when websites set or access them.

Where required by law (under PECR as amended by the DUAA 2025), we will ask for your consent before placing non-essential cookies on your device. However, consistent with the DUAA 2025 relaxation, we may place certain cookies that are used only to collect statistical information or to improve functionality without requiring prior consent, provided we give you a clear opt-out mechanism. Disabling certain cookies may affect website functionality.

For full details of the cookies we use, please refer to our Cookie Policy.

11. Disclosures of Your Personal Data

We may share your personal data with:

- Internal group companies within the Peel Group that provide administration, IT, finance, legal, marketing or other support services.
- External third parties including IT and hosting providers, analytics providers, payment and delivery providers, marketing platforms, professional advisers, insurers, auditors, regulators and public authorities.
- Third parties in connection with a sale, merger or restructuring of our business. Any new owners will use your data in accordance with this notice.

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 permit third-party service providers to use your personal data for their own purposes.

12. International Transfers

There may be occasions where we transfer your personal data outside the UK. We will only do so where compliant with data protection legislation and where an appropriate safeguard or lawful exception applies, including:

- Standard contractual clauses approved under UK law, or the UK International Data Transfer Agreement (IDTA) or Addendum.
- Transfer to a country or territory covered by UK adequacy regulations (note: the UK's adequacy decision from the European Commission was renewed in December 2025 until December 2031).
- Where the transfer is necessary for the performance of a contract in your interests.
- Where you have consented to the transfer.

The DUAA 2025 updates the UK's international transfer framework, applying a standard of whether the destination provides a level of protection that is "not materially lower" than the UK standard. We will keep our transfer mechanisms under review accordingly.

13. Data Security

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to your personal data is limited to employees, agents, contractors and third parties with a legitimate business need.

We have procedures to deal with suspected personal data breaches and will notify you and the ICO where we are legally required to do so.

14. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting or reporting requirements.
To determine the appropriate retention period, we consider the nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data, and applicable legal requirements.
By law we are required to keep basic information about customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease to be customers for tax purposes.
In some circumstances we may anonymise your personal data for research or statistical purposes, in which case we may use it indefinitely without further notice.

15. Your Legal Rights

Under data protection law, you have the following rights in relation to your personal data:

- Right of access: to request a copy of the personal data we hold about you.
- Right to rectification: to request correction of inaccurate or incomplete personal data.
- Right to erasure: to request deletion of your personal data where there is no good reason for us to continue processing it.
- Right to object: to object to processing based on legitimate interests where your particular circumstances justify it.
- Right to restriction: to request that we restrict processing in certain circumstances.
- Right to data portability: to receive your personal data in a structured, commonly used and machine-readable format, where this right applies.
- Right to withdraw consent: at any time where we rely on consent to process your data.
- Right to complain: to raise a complaint with us (see Section 3) or directly with the ICO at any time.

15.1 No Fee Usually Required

You will not have to pay a fee to exercise these rights. However, we may charge a reasonable fee, or refuse to comply, where a request is clearly unfounded, repetitive or excessive.

15.2 Identity Verification

We may need to verify your identity before processing a request. This is a security measure to ensure personal data is not disclosed to an unauthorised person. We may

also ask for clarification or further information. Where clarification is reasonably required to respond to a subject access request, we may pause the response period (as codified by the DUAA 2025) until we receive the information needed.

15.3 Response Timescales

We aim to respond to all legitimate requests within one month. Where requests are particularly complex or numerous, we may extend this period were permitted by law and will notify you accordingly.

16. Changes to This Privacy Notice

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.
We may update this privacy notice from time to time. Any material changes will be communicated to you. The current version will always be available on our website.