# **MARUBOX Cam Privacy Policy**

#### 1: Introduce

MARUBOX Cam is the leading company in car accessory, as an essential part of our business, we collect and manage customer data. In doing so, we observe Chinese data protection legislation, and are committed to protecting and respecting customers' privacy and rights. Specifically, we act as "Data Controller" in respect of the information gathered and processed by this website.

In order that you are reliably informed about how we operate, we have developed this Privacy Statement. Together with any additional Privacy Notices which you may see as you navigate around this website, this Privacy Statement describes the ways in which we collect, manage, process, store and share information about you as a result of you visiting this site. This Privacy Statement also provides you with information about how you can have control over our use of your data.

If you have any comments or queries regarding our use of your data, please contact our Data Protection Officer by email at wdtsales16@wdtsz.cn

2: What information do we collect about you?

In general terms, we seek to collect information about you so that we can:

- fulfil orders that you may make via this website;
- provide high-levels of customer care and support;
- communicate with you effectively whether this is about your order, or so that you don't miss out on great promotions, offers and helpful reminders.

The information that we need for these purposes is known as your "personal data". This includes your name, home address and e-mail address. We collect this in a number of different ways. For example, you may provide this data to us directly when filling in forms on this website, or when corresponding with us by telephone, e-mail or letter.

If you are placing an order with us, we may also take your credit card details: however, we do not save this data on any of our systems.

Please be advised that by using this website, we will not be collecting any special categories of data about you (i.e. data about your ethnicity, religion, health etc).

Please also be advised that when you visit this website, cookies will be used to collect

information about you such as your Internet Protocol (IP) address which connects your computer or mobile device to the internet, and information about your visit such as the pages you viewed or searched for, page response times, download errors etc. We do this so that we can measure our website's performance and make improvements in the future.

Cookies are also used to enhance this website's functionality and personalization, which includes sharing data with third party organizations. You can control this by adjusting your cookies settings as described in section 4 of our Cookies Policy here

#### 3: How will we use that information

We use the data collected from you for the specific purposes listed in the table below. Please note that this table also explains:

- the lawful basis for processing your data, linked to each processing purpose;
- in what circumstances your data will be shared with a third party organization; and
- for how long we keep data collected by this website.

Data that is collected by cookies is not included in the table below, but is explained in section 3 of our Cookies Policy here.

#### 4: Overseas transfers

None of the data that we collect, process or store about you is transferred outside the China . This includes information that is exchanged with any third party organization as described in section 3 of this Privacy Statement.

# 5: Your rights

Under the terms of data protection legislation, you have the following rights as a result of using this website:

# 5.1 Right to be informed

This Privacy Statement, together with our Cookies Policy, fulfills our obligation to tell you about the ways in which we use your information as a result of you using this website.

# 5.2 Right to access

You have the right to ask us, in writing, for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain this information at no cost. We will

send you a copy of the information within 30 days of your request.

# 5.3 Right to rectification

If any of the information that we hold about you is inaccurate, you can either:

- visit the "My Account" section of the website where you can make changes to some of the information that we hold about you;
- contact our Data Protection Officer at wdtsales16@wdtsz.cn. Any corrections that you request will be made as soon as possible, and certainly no later than 30 days following your notification.

#### 5.4 Right to be forgotten

From 3 October 2018, you can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully acted within 30 days. For further information, please contact our Data Protection Officer at wdtsales16@wdtsz.cn.

# 5.5 Right to object

You have the right to object to:

- the continued use of your data for any purpose listed in section 3 of this Privacy Statement for which consent is identified as the lawful basis of processing (i.e. you have the right to withdraw your consent at any time);
- the continued use of your data for any purpose listed in section 3 of this Privacy Statement for which the lawful basis of processing is that it has been deemed legitimate.

In some circumstances (i.e. consent to marketing communications), you can exercise your objection by updating your preferences within the "My Account" section of this website. For all other circumstances, you can contact our Data Protection Officer at wdtsales16@wdtsz.cn. Please note that you can also exercise your right to object to our use of cookies by following the guidance in section 4 of our Cookies Policy .

# 5.6 Right to restrict processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact our Data Protection Officer at wdtsales16@wdtsz.cn.

#### 5.7 Right to data portability

If you would like us to move, copy or transfer the data that we hold about you to another organization, please contact our Data Protection Officer at wdtsales16@wdtsz.cn.

Please be advised that this only applies to certain data which has been submitted by you electronically for specific purposes only. Our Data Protection Officer can provide further advice.

# 5.8 Rights related to automated decision-making

In order that we can understand your interests and preferences - and deliver communications that will be most of interest to you, where you have consented to receive these - we employ profiling techniques (which include automated decision-making) based upon the information that you have provided to us, as well as your purchasing history and engagement with us. We do not believe that these processes have any potential to significantly or negatively affect you i.e. they will not lead to any form of discrimination against you or impact your legal rights.

Where we hold a customer's details, we will also seek to ensure that, as far as possible, we maintain a single composite record of their interactions with us, which may require us to match their different activities. Where customers have indicated that they do not want us to us their data for receiving communications (other than those deemed legitimate), we will use this information purely for anonymizing internal analysis and reporting, for example, looking at sales trends which does not identify individual customers.

If you do not want us to undertake profiling or matching, you may either:

- object to the processing of your data (see section 5.5 of this Privacy Statement above); or
- request that MARUBOX Cam erases all personal data about you (see section 5.4 of this Privacy Statement above).

# 6.Data privacy and security

At MARUBOX Cam, we maintain a comprehensive data management work programme, which includes processes for ensuring that data protection is a key consideration of all new and existing IT systems that hold customers' personal data. Where any concerns, risks or issues are identified, we conduct relevant impact assessments in order to determine any actions that are necessary to ensure optimum privacy.

We also maintain an active information security work programme which seeks to protect the availability, confidentiality and integrity of all physical and information assets. Specifically, this helps us to:

protect against potential breaches of confidentiality;

- ensure all IT facilities are protected against damage, loss or misuse;
- increase awareness and understanding of the requirements of information security, and the responsibility of our colleagues to protect the confidentiality and integrity of the information that they handle; and
- ensure the optimum security of this website.

We recognize that the security of data and transactions on this website is of primary importance. We therefore ensure that all connections to secure parts of the website (such as when you login) are encrypted and authenticated using strong protocols, key exchanges and ciphers.

#### 7: Card payment security:

We are proud to have been awarded the Payment Card Industry Data Security Standard (PCI-DSS), which recognizes the robust processes that we apply when handling card transactions from the major card schemes. This independent certification gives our customers assurance that our transactional systems protect your data with appropriate levels of security.

# 8.Location tracking:

This website only uses geo-location tracking, which shows us where you are , for specific situations. These include:

- click and collect: on the product pages, you can check the availability of any selected item in your local store;
- store locator: you can search for your local store using your current location;
- store changes: we can inform you of local store changes based on your IP address.

In all situations, your permission will be sought before geo-tracking is used, and then, it is only used to personalize your experience.

This service is supported by Google Maps. Users are bound by the Google Maps / Google Earth Additional Terms of Service (https://maps.google.com/help/terms\_maps.html) which includes the Google Privacy Policy (https://www.google.com/intl/ALL/policies/privacy/index.html).

#### 9. Disclaimers

Every effort is made to ensure that the information provided on this website, and in this Privacy Statement, is accurate and up-to-date, but no legal responsibility is accepted for any errors or omissions contained herein.

We cannot accept liability for the use made by you of the information on this website or in this Privacy Statement, nor do we warrant that the supply of the information will be uninterrupted. All material accessed or downloaded from this website is obtained at your own risk. It is your responsibility to use appropriate anti-virus software.

This Privacy Statement applies solely to the data collected by us, and therefore does not also apply to data collected by third party websites and services that are not under our control. Furthermore, we cannot be held responsible for the Privacy Statements on third party websites, and we advise users to read these carefully before registering any personal data.

# 10.Accessibility:

We are committed to providing a website in which content is accessible to everyone. We therefore update our website regularly in order to make it as adaptable as possible.

For example, users can control the text size of each page within their browser. On a PC, holding the "Ctrl" key while pressing the "+" (plus) key will increase text size, and holding the "Ctrl" key while pressing the "-" (minus) key will decrease the text size.

#### 11. General

Questions and comments regarding this Privacy Statement are welcomed, and should be sent to our Data Protection Officer at wdtsales16@wdtsz.cn.

You can also contact our Data Protection Officer if you have any concerns or complaints about the ways in which your personal data has been handled as a result of you using this website.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted wdtsales16@wdtsz.cn.