

Digital Window Limited ("**We**") are committed to protecting and respecting your privacy.

This policy (together with our User Agreement <http://darwin.affiliatewindow.com/documents/legal/useragreement.pdf> and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the Data Protection Act 1998 (the "**Act**"), the data controller is Digital Window Limited of 3rd Floor, 100 Leaman Street, London E1 8EU.

Our nominated representative for the purpose of the Act is Peter Loveday (Chief Technical Officer).

## 1 **Information we may collect from you**

We may collect and process the following data about you:

- 1.1 Information that you provide by filling in forms on any of our websites which shall include without limitation the following <http://www.affiliatewindow.com>, <http://www.digitalwindow.com>, <http://www.shopwindow.com>, <http://wiki.affiliatewindow.com> and <http://darwin.affiliatewindow.com> ("**the Websites**"). This includes information provided at the time of registering to use the Website(s), subscribing to our service, submitting Content (as defined in the User Agreement) <http://darwin.affiliatewindow.com/documents/legal/useragreement.pdf> material or requesting further services. We may also ask you for information when you report a problem with the Website(s).
- 1.2 If you contact us, we may keep a record of that correspondence.
- 1.3 We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- 1.4 Details of transactions you carry out through the Website(s) and of the fulfilment of your orders.
- 1.5 Details of your visits to the Website(s) including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

## 2 **IP addresses and cookies**

- 2.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 2.2 For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve the Website(s) and to deliver a better and more personalised service. They enable us to:
- (a) estimate our audience size and usage pattern;
  - (b) store information about your preferences, and so allow us to customise the Website(s) according to your individual interests;
  - (c) speed up your searches; and
  - (d) recognise you when you return to the Website(s).
- 2.3 You may refuse to accept cookies by activating the setting on your internet browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website(s). Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website(s).
- 2.4 Please note that our advertisers may also use cookies, over which we have no control.

## 3 **Where we store your personal data**

- 3.1 The data that we collect from you may be transferred to, and be stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who may work for us or for one of our suppliers. Such staff maybe engaged in, among other things the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- 3.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website(s), you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 3.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal

data, we cannot guarantee the security of your data transmitted to the Website(s); any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **4 Uses made of the information**

4.1 We use information held about you in the following ways:

- (a) to ensure that content from the Website(s) is presented in the most effective manner for you and for your computer.
- (b) to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- (c) to carry out our obligations arising from any contracts entered into between you and us.
- (d) to allow you to submit Content to the Website(s) or any Interactive Service (as defined in the User Agreement) <http://darwin.affiliatewindow.com/documents/legal/useragreement.pdf>, when you choose to do so.
- (e) to notify you about changes to our service.

4.2 We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

4.3 If you have purchased goods or services from the Website(s), we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

4.4 If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

4.5 If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

#### **5 Disclosure of your information**

5.1 We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries from time to time, as defined in section 736 of the UK Companies Act 1985 or section 1519 of the UK Companies Act 2006 as applicable.

- 5.2 We may disclose your personal information to third parties:
- (a) In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - (b) If Digital Window Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
  - (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our User Agreement <http://darwin.affiliatewindow.com/documents/legal/useragreement.pdf> and or any other agreements between you and us, or to protect the rights, property, or safety of Digital Window Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. This may include disclosing personal information to a credit reference agency, who may keep a record of that information.

## 6 **Your rights**

- 6.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at: Digital Window Limited of 3rd Floor, 100 Leman Street, London E1 8EU.
- 6.2 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any of the personal data which may be collected from you under these policies by such third parties. Please check these policies before you submit any personal data to these websites.

## 7 **Access to information**

The Act gives you the right to access personal information held about you by us. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 (or any other fee determined by law) to meet our costs in providing you with details of the information we hold about you.

## 8 **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. If use of the data changes we will have to get consent anyway regardless of what we put in the privacy policy.

## 9 **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Chris Giddins ([chris.giddins@digitalwindow.com](mailto:chris.giddins@digitalwindow.com)), Digital Window Limited of 3rd Floor, 100 Leaman Street, London E1 8EU.

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