



## The Matchstick Men Group Privacy Policy (In Conjunction with Nicky Clarke)

The Matchstick Men Group consists of 4 companies, to whom this policy privacy relates,

- **G2S Limited**
- **Product Care Limited**
- **Design & Trade Limited**
- **Matchstick Men Hub Limited**

### Our contact details

The Matchstick Men Group  
Green Bank Business park  
Swan Lane  
Hindley Green  
Wigan  
WN2 4AY

Tel : +44 (0)1942 521 918  
Email: [compliance@matchstickmengroup.com](mailto:compliance@matchstickmengroup.com)

### The type of information we collect

We currently collect and process the following information

- personal identifiers needed to complete the requested service, such as
  - o Name
  - o Telephone number
  - o Email address
  - o Home, business or other address to which you request we deliver

### How we collect this information

The personal information we collect through operation of the Nicky Clarke retail platform is provided directly by the data subject through their interaction with the retail platform

### Why we have, or need, this information

In order to complete the provision of service or delivery of goods to the data subject, the information is needed to complete the sale of goods, manage, register or hold information on any product related warranties or extra services requested by the data subject. We also need to hold this information for the unlikely event of product recall or safety notices that must be issued in relation to products purchased.

As a provider of goods or services where a financial transaction is involved, we are also required to retain details as to those financial transactions in line with relevant taxation and financial accounting laws.



## Sharing of Data

We will only share your data under these circumstances

- Utilisation of 3<sup>rd</sup> party delivery agents where we cannot deliver goods
- Where a legal requirement enforces us to do so
- Where you provide specific consent for us to do so
- In order to discuss the provision of services or goods to you, with Nicky Clarke

Data Subjects submitting their data to us through the Nicky Clarke retail platform should be aware that we act only as a Data Processor and Nicky Clarke remains the sole Data Controller in relation to data submitted through the Nicky Clarke retail platform, and they, as the Data Controller may choose to share that data outside of their agreement with us.

Any data subject submitting data through the Nicky Clarke retail platform, with questions regarding any sharing of data undertaken by Nicky Clarke can view their privacy policy [here](#) for further details.

## Lawful basis for processing

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing your information is as follows

- Your consent.** You are able to withdraw your consent at any time. You can do this by contacting our Data protection, Information Security and Compliance team by using the contact details on the front page of this document
- We have a contractual obligation.** This is an obligation arranged directly with the data subject, at their request to purchase items from the Nicky Clarke retail platform
- We have a legal obligation.** Where any common law or statutory obligation is required to be included in any arrangement held with you.
- We have a legitimate interest to do so.** This primarily relates to using your data to provide necessary product updates or safety/recall notices, or to conduct business marketing, promotions or other processes for which we have your explicit consent

## How we store your personal information.

Your information is securely stored on suitably provisioned servers, either cloud-based servers provided by 3<sup>rd</sup> party suppliers, or on physically accessible servers on one or more of our operational sites, over which we have complete control.

We are certified to ISO/IEC 27001: 2013 Information Security Management Systems, and conduct regular internal audits, as well as subjecting our processes and policies to rigorously applied audits provided by 3<sup>rd</sup> party certification bodies.

Your information will only be retained for as long as is required to fulfill any arrangement with you for the provision of services or registration and management of product warranties. Where a financial transaction has taken place between us and you, records of this will be kept for no more than 6 years after the end of the financial year in which the transaction took place. Our financial years are laid out from 1<sup>st</sup> July to 30<sup>th</sup> June.

Where you register for any marketing, mailing, promotion or other special offer/services; your data will be retained until such a time as you withdraw your consent or exercise your right to be forgotten.



### Your data protection rights

Under data protection law, you have rights, such as

- a) **Your right of access.** You have the right to ask us for copies of your personal information as it is held by us. This is known as a “Data Subject Access Request”, and information on how to make such a request can be found at <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>
- b) **Your right to rectification.** If you believe that any of your personal information held by us is inaccurate, you have the right to ask us to rectify any inaccuracies, and you have the right to ask us to complete any information you believe is incomplete
- c) **Your right to erasure.** Also known as the “**right to be forgotten**”. You have the right to ask us to erase your personal information in certain circumstances. Where you request us to erase or forget your data, we will discuss this with you to ensure you understand any implication that may arise from this and we may offer “levels of erasure”. This may mean we remove you from marketing/ mailing lists **but** retain your data on a product registration database in the event of product related safety issues.
- d) **Your right to restriction of processing.** You have the right to request the way in which your data is processed is restricted in certain circumstances. Information on these rights can be found at <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-law-enforcement-processing/individual-rights/the-right-to-erasure-and-the-right-to-restriction/>
- e) **Your right to object to processing.** You have the right to object to the processing of your data in certain circumstances. This may include you objecting to us using your data for direct marketing, and more information can be found here <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>
- f) **Your right to data portability.** You have the right to request that we transfer the personal information you have provided to another organisation, or to you, in certain circumstances. More information on data Portability can be found here <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

You have the right to exercise your rights free of charge, and if you contact us to exercise any of those rights listed above, we have one month to respond to you to acknowledge the request. Within one month of receiving your request, we will respond to acknowledge your request, and such a response may include, but not be limited to

- An explanation of what we believe you have asked us to do, and this shall require confirmation from you
- A plan of what we will do in order to meet your request, which may also require acceptance or acknowledgement from you before it is undertaken
- An explanation to you of any impact that will arise from the undertaking, and this will require a statement from you to confirm your understanding of any implication arising from the actions required to meet your request

To exercise any of your rights listed above, you should contact us by using the contact details on the front page of this document.

### Deletion of your data

At any time where your data is deleted, this shall be done securely and in accordance with all known legal and regulatory requirements, as well as in line with our data retention, Storage and Disposition Policy under our ISO/IEC 27-001: 2013 Information Security Management System.



## How to complain

If you have any concerns about our use, storage, use or deletion of your data, you may also contact us through the details on the front page of this document.

You may also complain to the Information Commissioners Office

The Information Commissioners Office  
Wycliffe House  
Water lane  
Wilmslow  
Cheshire  
SK9 5AF

**Helpline Number:** 0303 123 1113

**ICO Website:** <https://www.ico.org.uk>