

Privacy Policy Observing the General Data Protection Regulations (GDPR)

James Convenience Retail Limited ("We") are committed to protecting and respecting your privacy.

This policy 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. By visiting <http://www.jamesretail.co.uk/> you are accepting and consenting to the practices described in this policy.

For the purpose data protection legislation, including the General Data Protection Regulations (GDPR) the data controller is James Convenience Retail Limited, of 4 Hazel Court, Midland Way, Barlborough, Derbyshire, S43 4FD.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information you give us. You may give us information about you by filling in forms on our site <http://www.jamesretail.co.uk/> (**our site**) or by corresponding with us by phone, e-mail or otherwise. This includes (but is not exhaustive of) information you provide when you register to use our site, subscribe to our service, search for a store location, submit an application for a career with us, and when you report a problem with our site. The information you give us may include (but is not exhaustive of) your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph, career history.

Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

1

USES MADE OF THE INFORMATION

We use information held about you in the following ways: **Information you give to us.** We will use this information:

to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

to notify you about changes to our service;

to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information: to administer our site and for internal operations, including troubleshooting, data

analysis, testing, research, statistical and survey purposes;

to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

to allow you to participate in interactive features of our service, when you choose to do so;

as part of our efforts to keep our site safe and secure;

to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

Business partners, suppliers and sub-contractors for the performance of any contract we enter into with [them or] you.

2

Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. Analytics and search engine providers that assist us in the improvement and optimisation of our site.

Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

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.

If James Convenience Retail 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.

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 terms of use, or terms and conditions of supply, and other agreements; or to protect the rights, property, or safety of James Convenience Retail Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, 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.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 our site; 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.

YOUR RIGHTS

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 enquiries@jamesretail.co.uk or in writing to 4 Hazel Court, Midland Way, Barlborough, Derbyshire, S43 4FD.

3

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. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The General Data Protection Regulations gives you the right to access information held about you. Your right of access can be exercised in accordance with the General Data Protection Regulations.

FACEWATCH

We use Facewatch facial recognition for the prevention of crime and protection of our staff and customers.

We supply facial images and incident details to Facewatch Ltd (Facewatch) of individuals reasonably suspected of having committed unlawful acts (Subjects of Interest). We also supply CCTV images of people entering our store(s) to Facewatch who, in real time, convert the images to biometric templates and compare them to their watchlist of Subjects of Interest and alert us if there are matches against SOIs relevant to our store (using proportionality rules). Biometric templates relating to faces not matched to the watchlist are deleted by Facewatch immediately to protect individual privacy and CCTV images are retained for up to 5 days in order to enable stores to report incidents post event.

We receive Facial Recognition Alerts instantly when a Subject of Interest enters our properties and these are always checked for accuracy by a staff member before acted upon them. If the staff member considers there is not a match between the alert they receive and the relevant person, they indicate this to Facewatch who instantly delete the alert data. If the staff member considers there to be a match with a subject of interest they indicate this to Facewatch who retain the alert data briefly in accordance with their policy.

We may access Facewatch CCTV images for up to 5 days in order to report unlawful acts carried out by an individual which we normally only identify after they have left the store.

The recipients or categories of recipients of the personal data include our staff and may include third parties who assist us with the prevention and detection of unlawful acts, including Facewatch, security guards and police as part of a formal post event crime report.

- The purposes of the processing is the prevention of unlawful acts against our customers, staff and business assets.
- The lawful basis for the processing of personal data is Legitimate Interest:

The legitimate interest for the processing is a compelling justification for us to protect our customers, staff and business assets from unlawful acts. Our Legitimate Interest Assessment is as follows:

It is our legitimate interest to be able to minimise the impact of unlawful acts by processing personal data to identify persons in our business properties who are reasonably suspected of having committed crime and taking reasonable and proportionate action. It is our legitimate interest to prevent crimes against us rather than just capture on CCTV crime that has taken place and report to police.

Our business is experiencing an ongoing crime problem. The business, staff and customers are experiencing significant harm as a result. We have tried reasonable measures other than Facewatch to prevent these crimes, including police reporting, human guarding (employees) and CCTV. These methods have failed to prevent the crime problem. We have considered the effectiveness of these and other methods to prevent crime. We consider it necessary to use Facewatch to prevent crime in our premises as we cannot reasonably otherwise protect our business, staff and customers from the harm caused by crime.

The processing of personal data and criminal offence data is necessary to achieve our legitimate purpose as it allows us to quickly and accurately identify individuals who are reasonably suspected of having committed crime, and to take reasonable and proportionate action in the circumstances. Without processing information in this way we would be unlikely to effectively identify such persons as they enter our properties, be less likely to prevent unlawful acts, and therefore more likely to experience crime, even with traditional tools available including security staff and/or CCTV monitoring. Reporting crime to police is similarly less effective than the use of Facewatch as this is post event rather than preventative.

We balance our legitimate interest against the individual's interests, rights and freedoms. We distinguish those individuals reasonably suspected of having committed unlawful acts from all other persons entering our properties by the use of Watchlists and Facial Recognition Alerts. There is always a human involved to verify any possible match between an individual entering our properties and an image on a Watchlist or Facial Recognition Alert. In the event of a confirmed match we may take reasonable and proportionate action in the circumstances.

- We take particular care when the data subject is, or appears to be, under 18 years of age and do not share this data with Facewatch.
- The lawful basis for the processing of criminal offence data is that it is necessary for the prevention and detection of unlawful acts.
- Facial Recognition/Special Category data:

Facial recognition algorithms are defined as Special Category data. Any such processing is conducted by Facewatch as data controller who are

able to comply with the additional legal requirements for this processing as explained on their website www.facewatch.co.uk.

- Retention Period

We do not retain alert data supplied to us by Facewatch. We retain facial images, descriptions, personal details, and incidents details including CCTV footage of individuals reasonably suspected of having committed unlawful acts (Subjects of Interest) for a period of as long as reasonably necessary to fulfil the purpose we collected it for.

- Your rights as a data subject

- The right to be informed

- The right of access

- The right to rectification

- The right to restrict processing

- The right to data portability

- The right to object

- Rights in relation to automated decision making and profiling

- The right to complain to the Information Commissioner's Office (ICO)

For a fuller explanation of these rights please see the website of the Information Commissioner's Office www.ico.org.uk

HOW LONG WE RETAIN INFORMATION

We will only retain your Personal Information for as long as reasonably necessary to fulfil the purpose we collected it for (including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements) and in accordance with the Data Protection Legislation.

Following this period, we will securely delete or anonymise your Personal Information unless we are required to retain a copy of such information under applicable law.

We may also retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

HOME NEWS DELIVERY

This section applies to those of our customers who have signed up to receive our Home News Delivery service (the "HND Service").

If you sign up to receive our HND Service, then we will collect and process Personal Information that you give in connection with your request to receive the service, including your name, email address and home address. We will use this information to perform the HND Service and to process any payments due from you in respect of your receipt of the HND Service.

We may also use and share anonymised and aggregated information relating to groups of HND Service recipients to learn more about customer behaviour and find ways of enhancing our services to you.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to enquiries@jamesretail.co.uk.