

# **Privacy Policy**

Last Updated: 20/05/2024

At Cou Cou, we care about your privacy. That's why we only collect personal data if we have a good reason to do so. That's also why we want to communicate transparently what we do with your data.

This Privacy Policy explains the types of information we may collect from you or that you may provide when using our Services. This Privacy Policy also describes Cou Cou's practices for collecting, using, maintaining and processing information.

For the purposes of European Economic Area data protection law (the "Data Protection Law"), the data controller of the data processed through the Services is the Customer who makes available and grants access and use of the Services to anyone on its behalf. For data retained through the website or data processed not through the Services [(i.e. contact details of potential customers or resumes sent to us from potential employees for the purpose of engagement with Cou Cou Intimates)], we are the controller (the "Controller").

# Who are we?

Cou Cou is an intimate essentials brand, aiming to bridge the gap between daily underwear and lingerie, while reducing the impact of our most disposed of garments.

The company behind Cou Cou is Cou Cou Intimates Ltd. Our registered company number is 10642211, and our registered office is at 78 Mill Lane, London, England, NW6 1JZ.

Our VAT number is GB351500637.

For ease of reference, we will further refer to ourselves using "we", "us", "our" or "Cou Cou Intimates". "You", "your" or "yours" means the organisation/individual using the Services Please feel free to reach us at <a href="mailto:hi@coucouintimates.com">hi@coucouintimates.com</a> if you have any questions.

# Which personal data do we collect and why?

Below you can find what type of personal data we collect, what we use it for and how long we will keep it:

## 1. Your first and last name and your address

We cannot be sure to address you correctly if we don't know who you are, and if you are purchasing an order from us we will need to know where to deliver this order to. We will keep this information in our customer database for as long as you do not object to us keeping it. You can always let us know if you no longer want us to keep this information

and we will delete it immediately.

#### 2. Phone number and email address

This is so we can easily contact you. In principle, we will never contact you unless it is to answer a question, let you know important information about your order, if we are working on an assignment for you or if you have applied for a job with us.

If you signed up to our newsletter, we may also send you updates on what Cou Cou is up to. We do not want to spam you and we understand if you would rather not receive newsletters. If that is the case, you can always let us know, or you can unsubscribe from our mailing list using the link you can find at the bottom of each newsletter.

We will keep your email address and phone number in our customer or candidate database for as long as you do not object to us keeping it. If you no longer want us to keep this information, you can also always let us know.

Please do note that for as long as we have an ongoing contract, we are not able to remove this information from our databases as we will need it to execute the contract. And even after our contract has ended, we may be under a legal obligation to hold on to some of this information for a bit longer. For example, under accounting legislation, we must keep copies of our invoices which may mention your email address.

## 3. IP-address, Preferences & Data

When you visit our Site or get in touch with us, we may collect, generate, store and use certain personal data about you. In some cases we will use cookies to do this, for further information about the cookies we use and how to opt out of such cookies please see the section on Cookies.

This personal data may include:

- technical information, including: the Internet protocol (IP) address used to connect your computer to the Internet; your login information (if accessing an account with us); browser type and version; time zone setting; browser plug-in types and versions; device types; operating system; time and date of consent and platform; and any phone number used to call our customer service number.
- information about your visit to our Site, including: the full Uniform Resource Locators (URL); clickstream to, through and from our Site (including date and time); products you viewed, searched for or purchased; 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 our Site.

We collect this data to help improve our site and your experience with Cou Cou. This information is stored on our customer database and Google Analytics. If you no longer want us to keep this information, you can also always let us know.

# 4. Information provided during job applications

If you apply for a position with us, you will provide us with personal data in your cover

letter and your CV.

We will save your contact details, cover letter and CV of every job applicant in our candidate database and may contact you in the future regarding job openings that may be of interest to you. Of course, we will delete all this information from our candidate database if you don't like us holding on to it. Just let us know at <a href="mailto:hi@coucouintimates.com">hi@coucouintimates.com</a> if this is the case.

## 5. Payment Information

All payments made on our website are possessed by a third party. We do not collect or store your card details or sensitive payment information. We do however collect your billing address to populate the invoice for your order.

These third parties have undertaken sufficient precautions to prevent the loss of your data. Some of these external data processors may be based in the United States and have certified their compliance with the EU-US Privacy Shield Framework, which means they will respect comparable data protection standards as those that apply in Europe.

We will keep your billing address for as long as you do not object to us keeping it. If you no longer want us to keep this information, you can also always let us know. It is important to note that we may be under a legal obligation to hold on to some of this information for a bit longer. For example, under accounting legislation, we must keep copies of our invoices which may mention your billing address.

## 6. Children's Data

Our website is not intended to be used by children, and we do not knowingly collect any personal information about children. If you are the parent or guardian of a child who has provided us with their personal information, please let us know at <a href="mailto:hi@coucouintimates.com">hi@coucouintimates.com</a> and we will promptly delete it.

## How do we collect your data?

#### From You:

We collect personal information from you directly. We may also collect personal information from you indirectly, including through your use of our Site and/or Application and/or where we draw inferences about you (both as described above).

# **Communication & Interactions with Cou Cou Intimates**

Below are a list a possible ways of communication in which we could collect personal information:

- Create an account with us on our Site:
- Make a purchase from our Site (or from us directly if you are one of our wholesale clients):
- Leave a review on our Site;
- Ask us to provide you with products and services
- Sign up to our newsletter

- Complete our contact us form on our Site;
- Correspond with us by e-mail, telephone, SMS or via our contact portal on our Site
- Mentioning or interacting with us on social media (for example by following/mentioning/tagging us or by contacting us directly).
- Apply for a job with us

#### Cookies:

Yes. We use cookies for the below reasons:

- o ensure that our Services function properly,
- understand how visitors use and engage with our website, and analyse and improve Services.

## What are cookies?

Cookies are small files which are placed on your computer when you visit a website. Cookies are saved in your browser's history and you can always delete them. You can also adjust your browser settings to prevent cookies from being saved on your computer.

There are two main types of cookies that can be set:

- **First-party cookies:** these cookies are placed and read by Cou Cou Intimates directly when you use our Services,
- Third-party cookies: these cookies are not set by Cou Cou Intimates, but by other companies, like Google, for site analytics purposes.

Cookies play an important role in helping us provide effective and safe Services. Below is a list of commonly used cookies and the purposes that apply to them. This list is not exhaustive and describes the main reasons why we typically use cookies:

### - Necessary cookies

These cookies are essential to the operation of the Services and make it usable by enabling authentication and load balancing.

#### Analytics cookies

We use [Google Analytics] to generate anonymous statistics on how visitors use the website. We use these cookies to enhance the user experience on our website and to know which parts of the website or platform are most frequently visited or clicked on. This service may also collect information regarding the use of other sites, apps and online resources. You can learn about Google's practices on their website. We have adjusted the Google Analytics settings to ensure no personal data is collected when you visit the platform.

## - Advertising cookies

We use Meta, Google, Pinterest, Shareable, LinkedIn and Business of Fashion for advertisements. We and our service providers will use cookies and similar technologies to direct Cou Cou Intimates ads to you through targeted advertisements for our products on other sites you visit and to measure your engagement with those ads. These advertising service providers may collect non-identifiable information about your visits to our site. Such non-identifiable information does not include your name, address, email

address or other personal information. The information is collected through the use of cookies and pixel tags.

In addition, you can click <u>here</u> to find further information about cookies and how to manage all cookies by changing your web browser settings.

# How do we protect your personal data?

We are really careful to ensure all your information is kept private.

We work hard to protect your personal data against unauthorised access or disclosure. To do so, we take organisational measures to ensure that access to your data is restricted to those employees or agents who need to have access to it to help us process it. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We also take a whole range of technical measures to protect your data. Technical measures include, for example, user access management, vulnerability testing & employment of continuous monitoring technologies.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If you want more information about the measures we take email us at contact us at <a href="mailto:hi@coucouintimates.com">hi@coucouintimates.com</a>.

# Do we share your data with others?

We will never sell your personal data to another party!

We do use the services of the following external data processors:

- Infrastructure and Web Hosting (i.e. Shopify)
- Analytics (i.e. Google)
- Ads (i.e. Google, Meta, Pinterest)
- Marketing Emails (i.e. Klaviyo)
- Payments (i.e. Shopify)
- ERP Systems (i.e. Cin7)
- Contracts (i.e. Docusign)
- Internal communications (i.e. Slack)
- Book Keeping (i.e. Xero)
- Sustainability Software (i.e. Futureproof)

We have entered into a data processing agreement with each of these external data processors which obliges them to only process your personal data based on our instructions and in compliance with this Privacy Policy.

These data processors will also have to take sufficient precautions to prevent the loss of your data. Some of these external data processors may be based in the United States and have certified their compliance with the EU-US Privacy Shield Framework, which means they will respect comparable data protection standards as those that apply in Europe.

You should know that in the following exceptional circumstances, your data could also be shared with others:

- If we are under a legal obligation to share data with the authorities or if we have to share data to comply with an enforceable government request, we don't have much of a choice and we will share the data the authorities ask for, which may include yours.
- If another company decides to buy the shares of our company or decides to buy Cou Cou Intimates from us, we will of course have to transfer your data to that company. That company will then take over all obligations under this Privacy Policy.

We will take all steps necessary to ensure that your data is treated securely and in accordance with this privacy policy and the General Data Protection Regulation (GDPR), and we have the necessary legal contract in place to fulfil these services.

# Can we change this Privacy Policy?

We may change this Privacy Policy from time to time. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

# Your rights

You may request us to send you a summary of the personal data processed about you. If you feel that your personal data has been processed incorrectly or incompletely, or if you feel that such processing was unnecessary, then you also can ask us to edit, supplement or erase your personal data from our databases. Under the applicable privacy legislation, you also have the right to the following:

- Right to be forgotten in certain circumstances, you can ask for the data we hold about you to be erased from our records. Bear in mind, if you ask us to erase your information from our records, we may purchase data in the future that contains your information. We can however mark it as "do not contact" therefore stopping any contact we may make to you.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- **Right of portability** you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** you have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain.

If you feel we have failed to respond correctly to a request for information, you have the right to lodge a complaint about us to the UK Information Commissioner's Office (https://ico.org.uk/) or with the relevant authority in your country of work or residence.

If you have any further privacy concerns or if you want to exercise your rights, you can contact us via email at hi@coucouintimates.com.

# Policy review

This policy was published by Meg McDonald on 20/05/2024 and will be reviewed periodically on an annual basis.