

# Privacy policy

## WEBSITE PRIVACY NOTICE ICE COMPETITIONS LIMITED

This is the privacy notice of Ice Competitions Limited, SC690854 ('we', 'our', or 'us').

Our registered office is at 1 Brooklands Avenue, Peterhead, Scotland, AB42 3NR

### Introduction

Ice Competitions Limited are committed to make sure your personal information is protected and secure. This notice describes how we collect, use, store, share, transfer and use your personal data to administer our business when you visit our website or enter a competition. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

This notice applies to personal data collected through our website and through social media platforms and online retail platforms, including Facebook, YouTube and Instagram.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### Personal data we process

#### How we obtain personal data

The information we process about you includes information:

- you have directly provided to us
  - that we gather from third party databases and service providers
  - as a result of monitoring how you use our website

#### Types of personal data we collect directly

When you use our website, our services or buy from us, for example, when you create an account on our website, we ask you to provide personal data. This can be categorised into the following groups:

- personal identifiers, such as your first and last names, your title and your date of birth
  - contact information, such as your email address, your telephone number and your postal addresses for billing, delivery and communication
  - account information, including your username and password
  - payment information, such as a debit or credit card number and expiry date and bank account details
  - records of communication between us including messages sent through our website, email messages and telephone conversations
  - marketing preferences that tell us what types of marketing you would like to receive

In addition for the winning entrant we may also process documentation that confirms your identity, such as an image of your passport or driver's licence.

### **1. Types of personal data we collect from third parties**

We confirm some of the information you provide to us directly using data from other sources. We also add to the information we hold about you, sometimes to remove the need for you to provide it to us and sometimes in order to be able to assess the quality of the services you offer.

The additional information we collect can be categorised as follows:

- information that confirms your identity
  - information that confirms your contact information
  - unsolicited complaints by other users

### **Types of personal data we collect from your use of our services**

By using our website and our services, we process:

- information you contribute to our community, including reviews
  - your replies to competitions, polls and surveys
  - technical information about the hardware and the software you use to access our website and use our services, including your Internet Protocol (IP) address, your browser type and version and your device's operating system
  - usage information, including the frequency you use our services, the pages of our website that you visit, whether you receive messages from us and whether you reply to those messages
  - transaction information that includes the details of the products services you have bought from us and payments made to us for those services

### **Our use of aggregated information**

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

### **If you do not provide personal data we need**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract.

In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

### **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal data.

We may use it in order to:

- verify your identity for security purposes when you use our services
  - provide you with our services
  - provide you with suggestions and advice about our services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, such as how the competition works, information on our prizes or our services, you provide your consent to us to process information that may be personal data.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to our use of non-essential cookies when you access our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [info@icecompetitions.co.uk](mailto:info@icecompetitions.co.uk) . However, if you do so, you may not be able to use our website or our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

### **Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
  - whether processing (or not processing) might cause you harm
  - whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- improving our services
  - record-keeping for the proper and necessary administration of our business.
  - responding to unsolicited communication from you to which we believe you would expect a response
  - preventing fraudulent use of our services
  - exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
  - insuring against or obtaining professional advice that is required to manage business risk
  - protecting your interests where we believe we have a duty to do so

### **Information we process because we have a legal obligation**

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal data.

### **How and when we process your personal data**

#### **Information you provide**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

For example, when you leave a review or post a message on our website, we reasonably assume that you consent for the message to be seen by others. We may include your username with your message, and your message may contain information that is personal data.

Other examples include:

- tagging an image
  - clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal data, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

We provide you with a public profile page, the information on which may be indexed by search engines or used by third parties. The information you provide on that profile page may be made available to the public.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal data that you have posted. You can make a request by contacting us at [info@icecompetitions.co.uk](mailto:info@icecompetitions.co.uk)

### **Payment information**

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of TRUST Payments Limited. That page may be branded to look like a page on our website, but it is not controlled by us.

### **Credit reference**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

### **Service providers and business partners**

We may share your personal data with businesses that provide services to us, or with business partners.

As examples:

- we may pass your payment information to our payment service provider (TRUST Payments Limited) to take payments from you
  - we may use fraud prevention agencies and credit reference agencies to verify your identity and we may pass your information to those agencies if we strongly suspect fraud on our website

### **Use of information we collect through automated systems**

## **Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you may not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
  - to record whether you have seen specific messages we display on our website
  - to keep you signed in to our website
  - to record your answers to questions, surveys or questionnaires on our site

## **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **Other matters**

### **Your rights**

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### **Use of our services by children**

Our Website is not intended for use by anyone under the age of 18. We do not sell products or provide services for purchase by children.

We collect data about all users of and visitors to the website, we do not knowingly collect data or market to anyone under 18 years of age.

If for any reason you are aware that we may have collected data from anyone under the age of 18, please contact us at [info@icecompetitions.co.uk](mailto:info@icecompetitions.co.uk) and we will take reasonable measures to ensure this data is deleted from our records.

### **Delivery of services using third party communication software**

With your consent, we may communicate using software provided by a third party such as Facebook (WhatsApp), Apple (Facetime), Microsoft (Skype) or Zoom Video Communications (Zoom).

Such methods of communication should secure your personal data using encryption and other technologies. The providers of such software should comply with all applicable privacy laws, rules, and regulations, including the GDPR.

If you have any concerns about using a particular software for communication, please tell us.

### **Data may be processed outside the UK**

We may use outsourced services in countries outside the UK from time to time in other aspects of our business. Accordingly data obtained within the UK or any other country could be processed outside the UK.

For example, some of the web-based software we use may have been developed in the United States of America.

To ensure that we safeguard your personal data, we use data protection clauses in our contracts with data processors, including transfer clauses written by or approved by a supervisory authority.

- **Control over your own information**

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes at [info@icecompetitions.co.uk](mailto:info@icecompetitions.co.uk)

At any time, you may contact us to request that we provide you with the personal data we hold about you.

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

- **Communicating with us**

When you contact us, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

- **Complaining**

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us at [Info@icecompetitions.co.uk](mailto:Info@icecompetitions.co.uk)

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

We aim to investigate all complaints relating to user generated content. However, we may not be able to do so as soon as a complaint is made. If we feel that it is justified or if we believe that the law requires us to do so, we shall remove the content while do so.



Making a complaint may not result in the removal of the content. Ultimately, we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

If your complaint reasonably requires us to notify some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

- **Retention period**

Except as otherwise mentioned in this privacy notice, we keep your personal data only for as long as required by us:

- to provide you with the services you have requested
  - to comply with other law, including for the period demanded by our tax authorities
  - to support a claim or defence in court
- **Compliance with the law**

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

- **Review of this privacy policy**

We shall update this privacy notice from time to time as necessary.