



---

# Privacy Policy

**Last updated August 2019.**

Hadham Enterprises Limited, a company registered in England and Wales with registered office at Hadham Enterprises Limited (t/a DigiIn) of 72 London Road, St Albans, AL1 1NS and registered company number 09622412 (“us”, “our”, “we”, “Diginbox”) are committed to protecting and respecting your privacy.

This privacy policy (“Privacy Policy”) sets out the types of personal data we collect and use when you access and visit <https://www.diginbox.com> (the “Website”), use the ‘Dig-In’ mobile application (the “App”), or otherwise contact or communicate us and how we may use that data.

## 1. Introduction

This Privacy Policy covers our collection, processing and use of personal data when you use any of our Website or App or when you otherwise contact or communicate with us.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Privacy Policy into several sections:

1. Introduction
2. What is personal data and what do we collect
3. How and why do we use/share your personal data
4. For how long do we keep your personal data
5. Security
6. Your Rights
7. Contact Details

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notices that we may provide on our Website or App at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you sign up to receive e-mail updates from us) so that you are fully aware of how and why we are using that data.

This Privacy Policy supplements other notices including our [Website Terms and Conditions](#), [Mobile Application End User Licence Agreement](#), and our [Cookies Policy](#) and is not intended to override or replace them.

We reserve the right to revise or amend this Privacy Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let users of the Website and/or App know. However, it is your responsibility to check this Privacy Policy before each use of the Website or App – for ease of reference the top of this Privacy Policy indicates the date on which it was last updated.

Please note that our Website and App are not directed at children under the age of 13 (each "Child" together "Children") and we do not knowingly collect personal data about Children. If you believe we have collected personal data about your Child, you may contact us at [help@diginbox.com](mailto:help@diginbox.com) and request that we cease processing data about your Child.

## **2. What is Personal Data and what do we Collect?**

### **What is personal data?**

Where this Privacy Policy refers to 'personal data' it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law all organisations in the UK are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the 'Your Rights' section of this Privacy Policy.

### **Data we collect from you when you use the Website or App**

Prior to setting up a user account, you will have been asked to give your consent to the collection and processing of your personal data in accordance with this Privacy Policy. If you wish to withdraw your consent, please uninstall the App immediately, following which we will endeavour to delete your personal as soon as possible. Alternatively please contact us.

### **Website and Communications**

Where we collect your personal data through this Website or receiving and responding to your communications, we may rely on our legitimate interests in storing and processing your personal data. By 'legitimate interests' we mean the interests of our business in

conducting and managing our business to enable us to give you the best service and the best and most secure experience of our Website. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

### **Voluntary Provision of Data**

You may give us information about yourself by filling in forms on our Website or App, including when you create a user account, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you enter a competition, prize draw or promotion or complete a survey on our site, and when you report a problem with our Website or App.

The personal data we collect from you when you create a user account may include your name, address, e-mail address, user name, nationality, date of birth, University, university course, year of study, duration of study and (optional) photograph profile picture. We may also collect any feedback you provide on product samples supplied to you by us or replies to any market research questions. The exact amount of personal data we collect will depend on precisely what details you volunteer to us as you interact with the Website or App.

### **Automated Collection of Data**

We may also collect personal data about you when you visit the Website through the use of technologies such as cookies. The following are examples of data we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages you view on our Website;
- length of visits to certain pages;
- subjects you viewed or searched for;
- page response times;
- records of download errors and/or broken links;
- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from the page; and
- the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time).

We use the data described above under 'Automated Collection of Data' for several different reasons. Firstly we use it to ensure that the Website work properly and that you are able to receive the full benefit of it. Second, we use the data to monitor online traffic and audience participation across the Website. We undertake both of these activities because we have a legitimate interest in doing so.

### **Third Party Resources**

We may use the services of third party services, such as Google Analytics, to help us to collect various data about you and the way that you use the Website in order to enable us to better understand your interests – both so that we can service content to you that we think will be of interest to you, and so that we can ensure that you are shown adverts delivered by third parties which are more likely to be of interest to you.

Where we use cookies to deliver these kind of services, the delivery of those cookies will be subject to your consent and you will be given the opportunity to refuse those cookies prior to them being delivered to your computer. You are also able to remove cookies from your device at any time.

For details of the cookies that we use on the Website, what those cookies do, and the privacy policies of the third parties which provide them (where relevant) please see our [Cookies Policy](#).

Please note that, while you have to option to consent to specific individual cookies that, unless specifically set out in our [Cookies Policy](#), we rely on our legitimate interests as our condition for processing your personal data on the basis set out in this section (specifically that we have a legitimate interest in optimising the Website content and ensuring that you are served with relevant commercial communications as you use them).

## **3. How and why do we use/share your personal data**

### **How do we use this personal data?**

Information you give to us. We will use this information:

- to carry out our obligations in relation to any contracts entered into between you and us, prize draws or other competitions and to provide you with the information, products and services that you request from us;
- to provide you with information about other product samples, goods and services we offer that are similar to those that you have already sampled, purchased or enquired about;
- to compile reports for our partners or product sample providers on our market research findings or the feedback you provide in relation to their samples. Please note that we will anonymise this information and we will not disclose identifiable

information to the product sample providers in these reports. We may, however, provide them with aggregate information about our users based on the feedback we receive on the product samples or in reply to our surveys. By way of example, we may inform them of the feedback received from users between a certain age range or of a particular gender;

- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;
- to ensure that content from our Website and App is presented in the most effective manner for you and for your computer.

*If you do not want us to use your data in this way, please do not take part in any survey on our Website or App.*

Information we collect about you. We will use this information:

- to administer our Website and App, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Website and App 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 Website and App 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).

### **Sharing your personal data**

Depending on how and why you provide us with your personal data we may share it in the following ways:

- we may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- with selected third parties who we sub-contract to provide various services and/or aspects of the Website and/or App's functionality, such as where third party plugins

provide functionality such as message boards or image hosting services (see “Service Providers” below); and

- with analytics and search engine providers that assist us in the improvement and optimisation of our Website and App as described above.

*We will not share your personal data with third parties in order for that third party to provide direct marketing communications to you, unless it relates to a specific activity which we are undertaking with a third party (e.g. a competition where a third party is providing the prize) and you have provided your consent for that use. Such activity may have its own terms and conditions relating to the way in which your personal data may be used, which you will be notified of at the relevant time.*

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that sale;
- if Dig-In or substantially all of its assets are acquired by a third party, in which case personal data held by us about our 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 if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply our Website and/or App’s terms of use or terms and conditions; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Service Providers**

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject.

## **Links to third party sites**

Where we provide links to third party websites such sites are out of our control and are not covered by this Privacy Policy. This includes the websites of the companies that we work with. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance with

their own privacy policies. Please check these policies before you submit any personal data to those websites.

#### **4. For how long do we keep your personal data?**

We will hold your personal data on our systems only for as long as required to provide you with the services you have requested or to perform the purpose for which that data was collected. If you require further information about our retention of personal data, please contact us.

Where you sign up to receive e-mail marketing from us we will retain your e-mail address on file should you ever 'opt-out' of receiving e-mails from us. We will retain your e-mail address in this way in order to ensure that we continue to honour and respect that opt-out request.

In some circumstances you can ask us to delete your data: see 'Your Rights' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this data indefinitely without further notice to you.

#### **5. Security**

We take the protection of your personal data very seriously. We use encryption (SSL) to protect your personal data when appropriate, and all the data provided to us is stored on secure servers once we receive it.

We may store your personal data on secure servers either on our premises or in secure third party data centres.

Please note that some of our service providers may be based outside of the European Economic Area (the "EEA"). These service providers may work for us or for one of our suppliers and may be 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. Where we transfer your data to a service provider that is outside of the EEA we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. If you would like more information about how the mechanism via which your personal data is transferred, please contact [help@diginbox.com](mailto:help@diginbox.com).

If we ever give you (or where you have chosen) a password which enables you to access certain parts of our Website or App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **6. Your Rights**

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

### **Right of Access**

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "subject access request").

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us at [help@diginbox.com](mailto:help@diginbox.com) and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

### **Your Right to Rectification and Erasure**

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "right to be forgotten").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

## **Your Right to Restrict Processing**

Where we process your personal data on the basis of a legitimate interest (see the sections of this Privacy Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

We may process your data on the basis of a legitimate interest in the following ways:

- Optimised Website or App content
- Track products and services that are popular

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us at [help@diginbox.com](mailto:help@diginbox.com) and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

## **Your Right to Portability**

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

## **Your Right to stop receiving communications**

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the

'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe using the 'unsubscribe' links that appear in the footer of all our emails, or by writing to us at [help@diginbox.com](mailto:help@diginbox.com) and telling us which communications you would like us to stop sending you.

### **Your Right to object to automated decision making and profiling**

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

### **Exercising your rights**

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **7. Contact Details**

If you have any queries regarding this Privacy Policy, if you wish to exercise any of your rights set out above or if you think that the Privacy Policy has not been followed, please email us at [help@diginbox.com](mailto:help@diginbox.com).