



## Data Protection Notice and Cookies Policy

We are committed to protecting and respecting the privacy of our customers. Please read the following Privacy and Cookies Policy carefully to ensure you are aware of how we use and protect your Personal Information.

If you are an employee of McColl's Retail Group plc, please refer to our Internal Privacy Policy (a copy of which may be found in the Policies section of the Head Office HO Intranet and the Forms section of the Branch Intranet) for information about how we use and protect your Personal Information.

### Key points to note:

- This Privacy and Cookies Policy will apply to any Personal Information McColl's Retail Group plc and/or Martin McColl Limited (together "McColl's") collects or otherwise receives about third parties ("you"), including when you use our websites '[www.mccolls.co.uk](http://www.mccolls.co.uk)' and '[www.mccollsplc.co.uk](http://www.mccollsplc.co.uk)' (together the "Website") or otherwise engage with us.
- When you use our Website or otherwise engage with us, we may collect Personal Information from you. This Privacy and Cookies Policy explains what Personal Information we collect and how we will only process this information (i) to provide our products and services to you (ii) to comply with our legal obligations, (iii) for the purposes of our legitimate business interests (namely to provide our services and to analyse the use of our Website and services to continually improve our business and your customer experience) and (iv) where we otherwise have your consent.
- You can ask us to stop using some of your Personal Information at any time and you also have the right to ask us to delete some of the Personal Information that we hold about you. Just contact us at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk).
- In addition to this Privacy and Cookies Policy please take the time to read our Website Terms of Use which will also govern your use of our Website.

### 1. Company Statement

We will only use Personal Information which is provided to us, or otherwise obtained by us, from which you can be identified ("**Personal Information**") as set out in this Policy. We will ensure that your Personal Information is handled in accordance with the "**Data Protection Legislation**" (meaning the UK Data Protection Act 2018, the UK GDPR (as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019/419), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and all similar or related legislation relating to the processing of personal information and/or privacy applicable to us).

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. McColl's reserves the right to change this Policy from time to time and you should therefore check this page frequently to ensure that you are happy with any changes.

In this Policy, "**McColl's**", "**we**", "**us**" and "**our**" refer to (i) McColl's Retail Group plc, registered in England and Wales with registered address Ground Floor West, One London Road, Brentwood, Essex CM14 4QP and with company registration number 08783477; and (ii) Martin McColl Limited, registered in England and Wales with registered address Ground Floor West, One London Road, Brentwood, Essex CM14 4QP and with company registration number 00298945.

For the purpose of the Data Protection Legislation, we are deemed to be the "**data controller**" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

## **2. Personal Information that we collect from you**

When you engage with us via our Website you may provide Personal Information about yourself including your name, address and contact details, including your email address and telephone number, date of birth and gender.

There are a number of different ways in which you engage with us via our Website including when you visit, register to use, or make an enquiry through the Website, fill in online forms, apply for or access a Plus account (further details of which are set out below in Section 10 of this Policy), register for, and make payments in relation to, the Home News Delivery service (further details of which are set out below in Section 11 of this Policy), participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey or when you report a problem with our Website.

When purchasing items in store, you may also provide us with your credit or debit card details in order to process your payment. Please note that these details will not be stored by McColl's, but rather will be encrypted and securely transferred to our payment services provider to enable the processing of your payment. McColl's does not retain a copy of, nor does it have access to, these

payment details. When you visit our stores we may also collect images of you via our CCTV systems, which are regarded as being your Personal Information. We use CCTV primarily for the purposes of crime prevention and where it is used in store, notices will be displayed to make you aware of this.

You will also provide us with Personal Information when you complete an application for a job on the Website and this may include additional details such as a personal description, photograph and CV. Unless you ask us to keep such information on file for future opportunities or we need to retain such information for compliance with our legal obligations, in the event that you are unsuccessful, we will only retain this Personal Information for as long as is reasonably necessary to process your application.

### 3. **Sensitive Personal Information**

In certain circumstances, you may provide us with some special categories of Personal Information ("**Sensitive Personal Information**"). Sensitive Personal Information that we may receive includes Personal Information relating to your religious beliefs, ethnicity, sexual orientation, medical or health conditions or the commission or alleged commission of a criminal offence. For example, you may provide us with Sensitive Personal Information when you apply for a job via the Website.

In such cases, the provision of this information is entirely voluntary and subject to your express consent, however, we may be unable to carry out some activities necessary to process your application without the provision of such information. Where we do receive Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

### 4. **Technical Personal Information that we collect from you**

Where you make use of our Website or otherwise engage with us we may also collect certain limited information about your device and your visits to our Website, which may be considered "**Technical Personal Information**". Technical Personal Information may include:

- (a) **Device data:** We may collect information about the type of device or platform you use (such as a computer or mobile device) to access our Website, the operating system and choice of web browser and, where applicable, details of any phone number used to call our customer service number.
- (b) **Location data:** Your use of our Website may generate geographical data, such as the location and time zone setting of a device, the domain name or the internet protocol (IP) address used to connect your device to the internet.

- (c) **Log data about your visit:** Your use of our Website automatically generates information about your visit which we may collect. This can include 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.
- (d) **Data about your interaction:** Our Website may provide you with the opportunity to interact with content in certain ways, such as by sharing content on social media or on our discussion boards. These interactions create data which we may collect, for example, the contents of a post or comment, or whether a link or image was shared using a particular social media network. Where you receive emails from us we may also collect information about email engagement rates and activities.

Some of the Technical Personal Information set out above will be collected by cookies that we use on our Website. For more information on the ways in which we make use of cookies, please see Section 15 of this Policy below.

## 5. **Personal Information that we receive from other sources**

We may receive Personal Information about you if you use any of the other websites we operate or the other services we provide. . In this case, we will have informed you when we collected that Personal Information that it may be shared internally and combined with data collected on this site. Personal Information collected from these sources will be handled in accordance with this Policy.

We may also receive information from third parties who collect Person Information from you and pass it on to us. These third parties may include our business partners, sub-contractors and payment and delivery service providers, in addition to advertising networks, analytics providers, search engine providers and credit reference agencies.

From time to time we may also be involved in the creation of additional website with a third party (for example, in connection with a specific promotion). In such circumstances we may receive Personal Information about you in connection with your use of that website.

Furthermore, we may receive information from past employers and others concerning your employment history where you apply for a job with us. Where this is the case the third party is responsible for information that will be shared, but once we are holding it, we will only handle it in accordance with this policy.

## **6. How we use your Personal Information**

We will only use your Personal Information in order to:

- (a) supply the products and/or services you (or another individual on your behalf) have requested and to provide you with information relating to its provision;
- (b) provide support to you in respect of those products and/or services;
- (c) improve our Website and services and to allow you to participate in interactive features of our Website;
- (d) comply with our own legal obligations;
- (e) perform internal business processes; and
- (f) where relevant, process your application for employment.

### **Marketing Communications and Newsletters**

Where you have explicitly consented or where we otherwise have a right to do so, we may also use your Personal Information to send you information by email or text message. Our emails and text messages will provide you with information about other goods and services we offer that may be of interest to you, as well as the latest news on competitions and promotions.

### **Social Media Competitions**

Where we offer a competition on social media from time to time, you may have the opportunity to subscribe to communications from us. You can unsubscribe to these communications using the link in the email at any time.

### **Job Openings**

If you request to be contacted about job openings, we will send you information about such job openings that may be of interest to you and/or inform you about important changes or developments to our services.

### **Market Research**

From time to time, where we have the right to do so under the Data Protection Legislation, we may also use your information to contact you for market research purposes. We may contact you by email or mail.

## **7. How long we retain your Personal Information**

We will retain your Personal Information 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.

## **8. Third Parties**

We may share your information internally with any member of the McColl's group or other selected third parties where we have your explicit consent or it is necessary for (i) the performance or provision of the goods or services you have requested, (ii) us to comply with our legal obligations, or (iii) our legitimate business interests.

We may also provide advertisers and advertising networks with aggregated information (information from which no individual is identifiable) about our users to enable them to select and serve relevant adverts to you and others. For example, we may inform advertisers that 500 men aged under 30 have clicked on their advertisement on any given day or provide advertisers with information to enable them to reach the kind of audience they want to target (for example, women in SW1). This type of aggregated information may also be provided to analytics and search engine providers who assist us in the improvement and optimisation of our Website. Only to the extent necessary, we may also provide certain details about you to a third party debt collection agency in order for McColl's to enforce its legal rights, where an amount owed by you in respect of any goods or services provided to you by McColl's fails to be paid.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the services you have requested.

## **9. Storage and transfer of your Personal Information**

We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

In processing your Personal Information, it may be transferred to, and stored at, a destination outside the UK. For example, the Personal Information you provide to us will be transferred to and stored on our servers, a number of which are located within the European Economic Area (with the remainder located in the UK). It may also be accessed by staff operating outside the UK who work for us or for one of our suppliers or group companies. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the UK. This means that we will only transfer your Personal Information to third parties outside the UK if that third party (a) is situated in a country that has been confirmed by the UK Government to provide adequate protection to Personal



Information, (b) has agreed (by way of a written contract or some other form of data transfer mechanism, in each case, approved by the UK Government) to provide all protections to your Personal Information as are required by the Data Protection Legislation; or (c) we have your explicit consent to do so. Where any transfer takes place under a written contract, you have the right to request a copy of the parts of that contract which relate to data protection and may do so by contacting us at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk).

By submitting your Personal Information to us, you acknowledge this transfer, storing or processing of your Personal Information.

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

## **10. Loyalty Schemes**

This section applies to members and prospective members of our any loyalty schemes we operate.

If you join a loyalty scheme, then we will collect and process Personal Information you give to us in connection with your registration for and membership of the loyalty scheme. This includes the information you give to us on registering for the Plus scheme, such as your title, name, address, email address, phone number and date of births and the information you give to us on entering any promotion in connection with the scheme. We will also collect information about your use of the loyalty scheme. This includes information about your use of your loyalty card, the purchases you make in our stores and your use of the pages relating to the loyalty scheme on our Website.

We use your information to see how you use the Plus scheme, to help us understand what you like to buy, to enable us to make Plus better for you and, where you have given your express consent, to contact you with offers and information about products and services that may be of personal interest to you. We may also use and share anonymised and aggregated information relating to groups of Plus users to learn more about customer behaviour and to find ways of enhancing our services to you.

We may from time to time use third parties to help us run our loyalty schemes.

## **11. Home News Delivery Service**

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.

### **Paying for the HND Service online**

If you choose to pay for the HND Service online via the Website, in addition to the information described above, we will also collect and process Personal Information such as your HND Service account number. We will use this information to manage your online HND Service account and provide you with information regarding your account balance.

All online payments made in respect of the HND Service will be processed by a third party processor, and the processing of such payments will be subject to the terms, conditions and privacy policy of that third party processor. Our current payment processor is WorldPay. WorldPay will use your personal contact and payment card details for the purpose of administering your payment and verifying the transaction.

## **12. Your rights**

You may choose to restrict the collection or use of your Personal Information in the following ways:

- There are various tick-boxes on our Website and on the forms we use to collect your Personal Information which you can use to indicate your preference to receive our marketing - or to not receive it.
- If you have been receiving marketing from us but change your mind and decide you don't want to hear from McColl's, you can unsubscribe by clicking on the 'unsubscribe' link at the bottom of any emails you receive from us, or by emailing us at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk). Where applicable, you can also exercise this right by logging into your Plus account on-line and accessing the "My Account" web-page and changing your preferences.

You are entitled to know some details about the Personal Information we hold about you and how that information is processed. If you would like to request this, please contact us via email at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk) or in writing to Customer Service, McColl's Retail Group plc, Ground Floor West, One London Road, Brentwood, Essex, CM14 4QP and we will provide you with the information to which you are entitled.

You have the right to request that we correct any Personal Information that we are holding about you that is incorrect or incomplete. You also have the right to



ask us to erase or stop processing any Personal Information we have about you where there is no longer a legal ground for us to hold it and, in some circumstances, you have the right to request that we transfer any information we hold about you to a third party. If you wish to exercise any of these rights, please contact us as soon as possible, at customerservices@mccolls.co.uk.

### 13. **Links**

Our Website 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 Information to these websites.

### 14. **Security**

Please note that the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website and any transmission is therefore at your own risk.

### 15. **Cookies**

Our Website uses cookies to distinguish you from other users of our Website. A cookie is a small file that a website puts on your device so that it can remember something about you at a later time. Cookies helps us to provide you with a good experience when you browse the Website and help us to analyse web traffic and identify which pages of our Website are being used.

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings). We do not use cookies to store any of your financial information on your computer.

In particular, we use the following cookies:

- (a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the Website and use its features.
- (b) **Performance cookies.** These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website works.

- (c) **Functionality cookies.** These cookies allow our Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of the Website that you can customise. The information these cookies collect is anonymised and they cannot track your browsing activities on other websites.

You may see a message on our Website before we store a cookie on your computer which describes the types of cookies we use and what information they might collect. We may also use banners and pop-ups from time to time to give you options around cookies use.

You can also manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including essential cookies) via your browser settings you may not be able to access all or parts of our Website.

You can find more information about the specific cookies we use and the purposes for which we use them in the table at the end of this Policy. You can also find more information about cookies generally here: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 16. **Questions and Complaints**

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk). Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

## 17. **Changes to this Policy**

Any changes we may make to this Policy in the future will be posted on our Website and, where appropriate, notified to you when you next access our Website. It is your responsibility to ensure that you are aware of the latest version of this Policy and by continuing to use our Website or otherwise engage with us, you will be deemed to have accepted any revised terms.

## 18. **Contact Us**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to our Customer Service team via email at [customerservices@mccolls.co.uk](mailto:customerservices@mccolls.co.uk) or in writing to Customer Service, McColl's Retail Group plc, Ground Floor West, One London Road, Brentwood, Essex CM14 4QP.

## Our Cookies

[WWW.MCCOLLS.CO.UK](http://WWW.MCCOLLS.CO.UK)

Cookie Name	Description/Purpose	Duration
<b>Essential cookies</b>		
None		
<b>Performance cookies</b>		
__utm.gif	Google Analytics Tracking Code that logs details about the visitor's browser and computer	Session
__utma	Collects data on the number of times a user has visited the website as well as dates for the first and most recent visit. Used by Google Analytics	Two years
__utmb	Registers a timestamp with the exact time of when the user accessed the web site. Used by Google Analytics to calculate the duration of a website visit.	Session
__utmc	Registers a timestamp with the exact time of when the user leaves the web site. Used by Google Analytics to calculate the duration of a web site visit	Session
__utmt	Used to throttle the speed of requests to the server.	Session
__utmz	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	Six months
<b>Functionality cookies</b>		
webcookie	Used to record acceptance of the Cookie Policy	999 days

[WWW.MCCOLLSPLC.CO.UK](http://WWW.MCCOLLSPLC.CO.UK)

Cookie Name	Description/Purpose	Duration
<b>Essential cookies</b>		
ASP.NET_SessionId	Preserves the visitor's session state across page requests. Used by Share Price and RNS pages.	Session
AWSELB	Used to distribute traffic to the web site on several servers in order to	Session

	optimise response times. Used by Share Price and RNS pages.	
banner-seen	Records the user agreeing to the use of cookies from the initial cookie banner.	Ten days
incap_ses_#	Preserves users' states across page requests. Used by Share Price and RNS pages.	Session
visid_incap_#	Preserves users' states across page requests. Used by Share Price and RNS pages.	One Year
<b>Performance cookies</b>		
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the web site.	Two years
_gat	Used by Google Analytics to throttle request rate.	Session
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the web site.	Session
collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session
<b>Functionality cookies</b>		
nlbi_#	Used to ensure requests by a user on the Share Price and RNS feed pages are sent to the same origin server.	Session