



Privacy Policy

Updated 24 May 2018

General – about this policy

This privacy policy sets out the principles that Fashion, Law & Business will follow in the management of your personal information. It also highlights the principles we adhere to relating to processing of personal data under the Under the General Data Protection Regulation (EU) 2017/676. Fashion, Law & Business will only collect, use or disclose personal information in accordance with the Act and this privacy policy.

Fashion, Law & Business is committed to protecting and respecting your privacy. We take your privacy and protecting your personal data very seriously and we ask that you read this privacy policy carefully as it contains important information on the personal information we will collect about you, what we do with your information, the circumstances under which your information might be shared with third parties, and your rights in relation to the personal data you provide to us.

We may amend this privacy policy at any time and for any reason. The updated version will be available at www.fashionlawbusiness.com. We may highlight changes to this policy on our websites, but you should check this policy regularly for changes.

Collection and use of Information about you

Personal information provided by you:

Your “personal information” is any information or opinion about you, or from which you are reasonably identifiable.

The information you give us may include personal information like your name, address, email address, telephone number, date of birth and bank details. You may give us your information by filling in forms including those on our website (www.fashionlawbusiness.com) or by corresponding with us in writing, by telephone, email or otherwise. This includes information you provide when you correspond with us, in particular regarding our Newsletter subscription, Fashion Law Masterclass enrolment forms, careers section of our website, or any of our other activities and or services provided through the Fashion, Law & Business website. Further details on the information we may collect and the purpose for its processing are below:

Information we collect from you

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site www.fashionlawbusiness.com (our "Website") or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our Website, place an order for services on our Website and when you report a problem with our Website. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information and other information related to your assets.
- **Information we collect about you.** With regard to each of your visits to our Website we will 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; and
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (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), methods used to browse away from the page, and any phone number used to call our customer service number.
- **Information we collect through our website (use of cookies)**
 - Our website uses cookies. Cookies are small amounts of information that are sent to and are stored on your computer. They are used to identify you when you visit the site, and to make your use of the site more convenient for you. Cookies are used to remember usernames, passwords and preferences and to deliver a faster and more personalised service. These cookies allow us to distinguish you from other users of the website and allow us to collect information about your visit to our website which enables us to provide you with a more enhanced service.

How will we use the information about you?

Information Collected

The paragraphs in this section explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

Fashion, Law & Business will from time to time, collect personal information in the course of its business. The types of personal information Fashion, Law & Business collects and the purposes for which that personal information is used will depend on the circumstances. Some examples of the types of information Fashion, Law & Business ordinarily collects in certain situations and how it is ordinarily used are set out below. We may process the information we collect about you:

We may use your personal information for the following purposes:

the purpose for which it was collected (and related purposes which would be reasonably expected by you);

- purposes to which you have consented; or
- as otherwise authorised or required by law.

Generally, we will only use the personal information that we collect about you for purposes connected with our business operations. These purposes may include:

- verifying your identity;
- contacting you (including via electronic messaging such as email or in any other lawful manner);
- providing services to you;
- addressing any issues, problems or complaints that we or you have regarding our relationship; and
- developing and improving our products, services and business.

Basis for processing personal data we collect about you:

- for the administration of the Fashion Law Masterclass, and our annual events. This includes contacting you to provide you with information you have requested about these activities and notifying you of any changes in respect of these. The information we may process for these purposes includes your name, address, email address, phone number, date of birth and bank details. As outlined above, this information may be collected from you in various ways including but not limited to newsletter forms, enrolment forms, correspondence you send to us, telephone calls you make to us or through any website contact forms. The basis for this processing is to perform the contract with you related to these activities and services or because you have asked us to take specific steps before entering into a contract in respect to these activities and services;
- to respond to any communications that you send to us. This information may be collected from any correspondence you send to us, telephone calls you make to us, or through any website contact forms. This information includes your name, address, email address and phone number, date of birth and bank details and may be processed by us for the purposes of responding to you and keeping record of those communications. This processing is necessary for the administration of our business and the provision of our services, which is necessary for the legitimate interests of our business;
- to provide you with information about services we offer that are similar to those that you have previously utilised or enquired about. The information we may process for this purpose includes your name, address and email address. Fashion, Law & Business may from time to time use your contact information to tell you about news or events provided by Condé Nast College or one of the Condé Nast brands. You may opt-out of receiving such mailings, either when you register with Fashion, Law & Business or at any time afterwards. This processing is necessary for marketing and promotion of our products and services, which is for the

legitimate interests of our business. Fashion, Law & Business may also contact you with important information about your registration details even if you have opted-out of receiving promotional emails. Please see more on 'Marketing' below;

- To make our website better: We will also process your personal data in order to provide you with a more tailored experience when you visit our website. For example, we may use your personal data to tailor our website, make sure it is displayed in the most effective way for the device you are using. We also use various third party cookies to help us improve our website (more details are set out in the sections below) but we will not share your personal data with the third party analytics and search engine providers that assist us in the improvement and optimisation of our website. We will also process your personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research and statistical and survey purposes. This processing is necessary for the development and improvement of our website, products and services, which is necessary for the legitimate interests of our business. You can prevent this processing at any time by modifying the settings of your web browser to reject the cookies we use or disable cookies completely. The legal basis on which we process your personal data in these circumstances is our legitimate interest to provide you with the best possible website we can, and to ensure that our website is kept secure.
- in connection with our recruitment process and the recruitment process of third-parties. This information may include the information you have provided in your application form, CV or covering letter through Services offered on the 'Careers' section of our Website,
- to comply with any legal obligation or to enforce or apply **FLB Terms and Conditions of Use** or any other agreements; or to protect the rights, property, or safety of FLB and its customers, or other third parties. The information we may process for this purpose may be any personal information that is referred to in this privacy policy. This processing is necessary for the protection and enforcement of our rights and the rights of third parties and the proper administration of our business, which is necessary for the legitimate interests of our business and to comply with our legal obligations; and
- to detect and prevent fraud. The information we may process for these purposes includes your name, address, email address, telephone number, date of birth and bank details. This information may be collected from you through membership agreements, licence agreements, Payback claim forms, correspondence you send to us, telephone calls you make to us or through any website contact forms. This processing is necessary for our legitimate interests by ensuring the proper management of our business and financial risks.
- For marketing purposes: Where you have opted in to receive marketing communications from us, we will process your personal data to provide you with marketing communications in line with the preferences you have provided. The legal basis on which we process your personal data for marketing purposes is your consent. We will only send you information by email about products or services we feel may interest you. If you have previously requested information from us or utilised our products or services, we will only contact you by email with information about products and services similar to those you have previously utilised or enquired about. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at data@fashionlawbusiness.com or, where relevant, by following the unsubscribe link in any marketing communication you receive from us.

In general, Fashion, Law & Business collects the following types of personal information: name, contact information (including postal and e-mail address and telephone numbers), gender, age and date of birth, product preferences, purchasing histories, and other information relating to a dealings with us. We generally use this personal information to assist in the supply of services, for promotional purposes and for our internal administrative purposes

Disclosures

Fashion, Law & Business may disclose your information, under strict terms of confidentiality and restriction of use, to our service providers and business partners of Fashion, Law & Business partners to assist us in performing any contract we enter into with them or you and/or who supply services on behalf of Fashion, Law & Business and who need to process personal data in the provision of such services.

A list of such third parties and agents is as follows:

- MailChimp: used to send administration of service emails such as email verification, password reset and welcome email; and other potential marketing messages where you have given your explicit consent for us to do so.
- The Condé Nast College of Fashion & Design, the first educational establishment of the Condé Nast Publications Ltd. in the UK used by us to host our Fashion Law Masterclasses
- Eventbrite: an event management and ticketing service used by us to host our event's including but not limited to our Fashion Law Masterclass.
- Stripe: used by us to process online payments.

Fashion, Law & Business requires our contractors and third parties to keep personal information confidential and not to use or disclose it for any purpose other than performing services for us or on our behalf and to comply with this privacy policy and the requirements of the Act.

How long we keep your personal information

We will only hold your personal information on our systems for as long as is necessary to provide you with the goods and/or services you have requested.

How we store your personal data

All information you provide to us is stored on secure servers. 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. You must not share your password with anyone. Where we have processed your personal data to provide you with marketing communications with your consent, we may contact you at least every 12 months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our list.

Age restrictions

If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide personal information to the Websites. Users without this consent are not allowed to provide us with personal information. If we become aware that you are under [16] and are attempting to or have submitted personal information via the Websites without your parent/guardian's permission, we will not accept such information and we will take steps to remove such information from our records. This may involve us having to access and verify your age and other relevant details.

Your rights under data protection laws

As a data subject under the General Data Protection Regulation (EU) 2017/676 in certain circumstances, you have the following rights in relation to your personal data:

Right of information and access (Art.15)

You have the right to request access to your information relating to our use of your personal data which we hold on you, as well as various other information relating to our use of your personal data. Should you wish to access the personal data we may hold about you then you can request this from us in writing. Upon written request, we will provide you with a readable copy of the personal data which we keep about you. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the written request.

Right to rectification (Art.16)

You can require us to rectify any inaccuracy or mistakes in your personal data which we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

Should you require us to rectify any inaccuracies to the personal data we hold about you, please send a written request to details under the 'contact us' section provided below. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the request.

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please email, call or write to us (see the 'How can you contact us?' section below). If you would prefer to be contacted by post over email, then please let us know.

Right to erasure ('right to be forgotten') (Art. 17)

You can require us to erase personal information we hold about you without undue delay in the following circumstances:

- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you withdraw consent on which the processing is based and there is no other legal ground for the processing of the data;
- you object to the processing and there is no overriding legitimate interest for us to continue the processing of the data;
- your personal data was unlawfully processed; or

- your personal data must be erased in order to comply with a legal obligation.

We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Right to restriction of processing of your personal data (Art.18)

You have the right to restrict the processing of your personal data in the following circumstances:

- you contest the accuracy of the personal data;
- you have objected to our processing of your data, and we are considering your objection because we have said the processing is necessary for the purpose of our legitimate interests;
- the processing is unlawful and you do not wish for the data to be erased but require restricted processing of the data instead; or
- we no longer require your personal data but you require the data to establish, exercise or defend a legal claim.

When processing of your data has been restricted, we will be permitted to store your data but will not perform any other processing of it, unless you consent to further processing or processing is necessary for the establishment of a legal claim; for the protection of rights of another person; or for reasons of important public interest.

Right to data portability (Art.20)

You have the right to receive your personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

Right to object to (Art 21.)

You have the right to object to us processing your personal data where our legal basis for processing the data is:

- for the purposes of our legitimate interests or for the performance of a task carried out in the public interest or any official authority held by us. Should you object to our processing of your personal data on these legal bases, your objection must be based on grounds relating to your particular situation. If you make such an objection, we will stop processing the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is necessary for the exercise or defence of legal claims;
- direct marketing (including profiling). Should you object to our processing of your personal data for direct marketing purposes (including profiling), we will stop processing your personal data for this purpose; and
- for scientific or historical research purposes or statistical purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest. Should you object to our processing of your personal data on this legal basis, your objection must be based on grounds relating to your particular situation.

Right to withdraw consent (Art.7)

Where we have relied on your consent for the processing of your personal data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent please, email, call or write to us using the contact details under 'How to contact us' below.

Exercising your rights

We will provide the information without charge, but we may charge a reasonable fee for the administrative cost of providing the information where the request for information is unfounded, repetitive or excessive. To request a copy of your personal data we hold about you please inform us in writing, addressing your request to the Data Department using the contact details under the 'How can you contact us?' section below. You can exercise such rights by contacting us at data@fashionlawbusiness.com

Links on our website

Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. Our service connects you to different websites. If you follow a link to any of these websites or use our service, please note that you have left our website and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

Our Website contains links to third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third party websites.

Security

Fashion, Law & Business will take reasonable steps to keep any personal information we hold about you secure. Once we have received your information, we will use strict procedures and security features to try to prevent any unauthorised access, however even though Fashion, Law & Business will do its best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website, any transmission is at your own risk. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

Changes to our privacy policy

Fashion, Law & Business may make changes this policy from time to time. Any changes we make to our privacy policy will be posted on this page, and where appropriate, notified to you by email. We therefore encourage you to review it from time to time to stay informed of how we are processing your information.

Complaints about Privacy

We take your privacy very seriously and try to adhere to the highest standards when collecting and processing your data. However If you are concerned that Fashion, Law & Business may have breached its privacy obligations, the Act or this privacy policy then we encourage you to contact us

directly to see if your concerns can be addressed. When contacting us, please provide as much detail as possible in relation to your issue or complaint. Please contact us (see our section on contact below).

All complaints will be taken seriously and will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information we may require.

If you are not satisfied with our handling of your complaint, you may refer the issue to the **Information Commissioner's Office** to lodge a complaint. You can contact the Information Commissioner's Office helpline on 0303 123 1133 or by email to **casework@ico.org.uk**.

Questions about privacy

If you have any questions about this privacy policy or the information we hold about you, or would like us to update or correct any information we have about you, including requests to exercise any of your rights in relation to your personal data. Please contact us at: data@fashionlawbusiness.com

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