

## THE EMPEROR COLLECTION – PRIVACY & COOKIE POLICY

By using the products and services offered by The Emperor Collection, including but not limited to: [www.theemperorcollection.com](http://www.theemperorcollection.com) (Website), The Emperor Collection (App), you agree to be bound by the following Privacy & Cookie Policy:

The Privacy & Cookie Policy is set out into the following sections: Definitions, Introduction, Privacy Policy, and Cookie Policy.

### **Definitions:**

Competition Winner – The individual who is drawn as a winner of a Prize Competition.

Entrant – You/ Your(s)/ The individual entering into the Prize Competition(s) offered by the Promoter. Who has the legal capacity to do so and accepts the Promoter's Terms and Conditions.

GDPR – General Data Protection Regulation

Personal Data – Any information which can be used to identify an individual (such as their name, residential address, email address, or phone number).

Privacy & Cookie Policy – <https://theemperorcollection.com/privacy-cookie-policy/>

Prize – What an Entrant of a Prize Competition could win.

Prize Competition – The type of competitions hosted by the Promoter. Which includes but is not limited to the following: Dream Automobile Competition, Luxury Good Competition, and Cash Competition.

Promoter's Platforms – Website, App, and any other channel where an individual can enter the Promoter's Competitions.

Promoter – The Emperor Collection (TEC/We/Our)

Terms and Conditions /Terms & Conditions/ T&C's – Document which must be accepted by all Users of the Promoter's platforms and any individual entering the Promoter's Competitions. The Terms & Conditions can be found at: <https://www.theemperorcollection.com/terms-conditions>.

User – Any individual who uses the Promoter's Platforms.

Website – <https://www.theemperorcollection.com>

### **Introduction**

#### **1. To whom does this Privacy & Cookie Policy apply?**

- 1.1. The Promoter – The Emperor Collection ('TEC', 'We', 'Our') operates Prize Competitions resulting in the allocation of Prizes as set in the Promoter's Terms & Conditions (which can be found at: <https://www.theemperorcollection.com/terms-conditions>).

- 1.2. The Entrant – You/ Your(s)/ Any individual who visits or uses the Promoter's Platforms, who has the legal capacity to do so and accepts the Promoter's Terms and Conditions.

## **Privacy Policy**

### **1. Preliminary**

- 1.1. When you interact with the Promoter's Platforms we may collect/you may provide information linking to your identity (also known as Personal Data). For the purposes of the General Data Protection Regulation (GDPR) and all other laws relating to the use and processing of your Personal Data, we are the "Data Controller", with the responsibility of deciding how your Personal Data is used and processed.
- 1.2. At The Emperor Collection (TEC) we are committed to protecting the privacy and security of our customers and platform visitors. We do not share your data with third parties for them to market their products/services to you.
- 1.3. This Privacy Policy (Privacy & Cookies Policy) supplements other notices and privacy policies, and does not override them.

### **2. What type of information is obtained?**

- 2.1. Upon registering with TEC or directly interacting with the Promoter's Platforms the following information may be collected by/provided to the Promoter:
  - 2.1.1. Identity – First name, Surname, Country of Residence.
  - 2.1.2. Contact – Residential Address, Email Address, Telephone/Mobile Number.
  - 2.1.3. Financial – Billing Address, Purchase Information, Purchase History.
  - 2.1.4. Profile – Your preferences for cookies and marketing, and any feedback provided.
  - 2.1.5. Social – If you choose to register for a TEC Account using any social media accounts.
- 2.2. The following information may be collected in accordance with the Promoter's Cookie Policy, when you use our Website, app, or other platforms:
  - 2.2.1. Platform Usage – Information about how you use the Promoter's Platforms.
  - 2.2.2. Technical – IP Address, Browser Type, Hardware type, Network and Software Identifiers, Device Information, Operating System, and System Configuration.
- 2.3. The Promoter does not store any payment type (e.g. debit/credit card) information.

### 3. What is your information used for?

3.1. The table below sets out how we use the information that is collected by/provided to us, and the lawful basis for doing so. We may process such information for more than one basis depending on the specific purpose it is used for.

| What data is used? | What is it used for?   | Legal purpose for using the data?  |
|--------------------|--|--|
| Identity           | TEC Account registration, enabling you to log-in to your TEC Account, enabling you to participate in a TEC competition, processing payments, arranging delivery for a Prize if you have won a competition, internal administration and processing, notification of any changes to our Terms & Conditions, Privacy & Cookie Policy, products, or services, answering any of your customer enquiries, contacting you regarding any third party product or services which you have requested further information about, improve and personalise your experience on any TEC Platforms which you may use, verification of your identity, opportunity to provide any feedback. | Performance of a contract, Consent, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity. |
| Contact            | TEC Account registration, enabling you to log-in to your TEC Account, enabling you to participate in a TEC competition, processing payments, arranging delivery for a Prize if you have won a competition, internal administration and processing, notification of any changes to our Terms & Conditions, Privacy & Cookie Policy, products, or services, answering any of your customer enquiries, contacting you regarding any third party product or services which you have requested further information about, improve and personalise your experience on any TEC Platforms which you may use, verification of your identity, opportunity to provide any feedback. | Performance of a contract, Consent, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity. |
| Financial          | Enabling you to participate in a TEC Competition, processing payments, internal administration and processing, verification of your identity   | Performance of a contract, Consent, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity. |
| Profile            | TEC Account Registration, internal administration and processing, contacting you regarding any third-party product or services which you have requested further information about, improve and personalise your experience on any TEC Platforms which you may use, verification of your identity, opportunity to provide any feedback.   | Performance of a contract, Consent, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity. |
| Social             | TEC Account Registration, enabling you to log-in to your TEC Account, internal administration and processing, verification of your identity  | Performance of a contract, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity.          |
| Platform Usage     | Internal administration and processing, improve and personalise your experience on any TEC Platforms which you may use, verification of your identity, opportunity to provide any feedback.  | Performance of a contract, complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity.          |
| Technical          | Internal administration and processing, improve and personalise your experience on any TEC Platforms which you may use, verification of your identity, opportunity to provide any feedback.  | Performance of a contract, Complying with legal obligations, Legitimate Interests (Internal administration & Service provision), Prevent, detect, and prosecute any fraudulent or illegal activity.          |

3.2. We will only use your Personal Data for the purposes for which we collect it. If we need to use your information for any other purpose which is not already stated in the Promoter's policies, we will notify you and explain the legal basis under which it applies to.

3.3. In addition to the above, we may anonymise and aggregate your information so that you cannot be identified. Such information can then be used for any purpose which includes but is not limited to internal administration and service provisions.

#### 4. Who we share the information with?

4.1. We do not share your data with third parties for them to market their products/services to you.

4.2. Any User information gained is only used for the purposes for which it is collected for. Such information may be shared with third parties in order to support the delivery of our products or services to you in the most effective way possible, this includes:

4.2.1. Improving and personalising the User experience on the Promoter's Platforms.

4.2.2. Operation of the Promoter's Competitions - Including but not limited to: Prize suppliers, Auditors, Promotional verification providers, Professional Advisers.

4.2.3. Delivering relevant TEC email and digital marketing, (to the extent which has been subscribed for).

4.2.4. Delivering relevant, targeted, and re-targeted advertising to keep you up to date about the Promoter's latest products and services.

4.2.5. Customer feedback and reviews.

4.2.6. Prevent, detect, and prosecute any fraudulent or illegal activity.

4.2.7. Other aspects relating to the delivery of the Promoter's products or services, which includes but is not limited to: Administration of Competitions, processing payments, administration of User accounts, and fulfilling any obligated duties.

4.3. In the event any information is shared with a third-party, it will be ensured that the information shared is strictly limited to the amount that is needed, and is subject to suitable obligations relating to the confidentiality and security of such information. Some third-party service providers may use cookies or other tracking technologies, which are explained more in depth in the Promoter's Cookie Policy.

4.4. In addition to the above, the Promoter may also be required to share information which has been gained, to any third-party if required by law or regulation. In such circumstance, it will be ensured that the information shared is strictly limited to the amount that is needed, and is subject to suitable obligations relating to the confidentiality and security of such information.

## 5. How is Data stored?

5.1. We adopt industry standard security processes to ensure data is encrypted, secure, limited to the needs it is required for, and to prevent unauthorised access or use of the data provided to us. Any data that is shared with a third-party to support in the delivery of products and services of the Promoter, is strictly limited to amount that is needed, and is subject to strict confidentiality and security standards.

5.2. Any information that is shared with the Promoter by any means, is done so by the Users own judgement and risk. The Promoter does not hold any responsibility nor liability for any late/ lost/or insecure data transmissions/storage of any kind or of any related matter.

## 6. How long do we keep your data for?

6.1. Any User data is stored and processed for along as the User has a registered TEC account and/ or where they are still happy to receive notifications about our latest news, products, and services.

6.2. If a User unregisters from their TEC account and where they have unsubscribed to not receive any notifications about our latest news, products, and services, then only Data that is required for legal purposes, Competition Prize draws & collection, and details regarding any issues will be kept, for as long as such information is needed, the remaining information shall be deleted.

6.3. Personal Data collected for purposes related to the performance of a contract between the Promoter and the platform User shall be retained until such contract has been fully performed.

6.4. Personal Data collected for the purposes of legitimate interests (internal administration and service provision) shall be retained for as long as needed to fulfil such purposes.

6.5. No data/information is stored for longer than is necessary.

## 7. Links to third-party platforms.

7.1. The Promoter's Platforms may contain links to third-party websites. Once you use such links and leave the Promoter's platform, the Promoter does not have any control over any third-party links or any third-party websites and is not responsible for the protection, security, and privacy of any information which you provide whilst visiting such sites. Your use of such third-party websites/platforms are not governed by this Privacy Policy (Privacy & Cookie Policy). You should take extra measures to examine and abide by the privacy policies and terms of use of such third-party websites/platforms.

## 8. Your rights over your information

8.1. In certain situations, you are entitled to;

8.1.1. Access a copy of your Personal Data that the Promoter holds about you;

8.1.2. Correct or update your Personal Data (which can be done via the "My TEC Account page");



8.1.3. Request the erasure of your Personal Data;

8.1.4. Object to the processing of your Personal Data which are classified as being purposes of Legitimate Interests (as stated in the table in S(3) What is your information used for;

8.1.5. Restrict to the processing of some of your Personal Data;

8.1.6. Request the transfer of your Personal Data to a third party or;

8.1.7. Where you have provided consent to certain processing of your data, you may withdraw such consent at any time, however some personal data may be retained, to be continued to be processed under any Legitimate legal grounds to do so.

8.2. If you require to exercise your rights regarding your information you can contact the Promoter by using the contact form on the Promoter's Website: <https://theemperorcollection.com/contact>. You don't have to pay a fee, unless your request is clearly unfounded, repetitive, or excessive (in which case the Promoter has the right to charge a reasonable fee to do so or alternatively, refuse to comply with such a request). Where your request is for a legitimate purpose, the Promoter's shall aim to respond within one month (unless it requires a legal request in which it may take longer). In such cases, we may also need to confirm the identity of the individual(s) making such a request, and you will be required to provide such information when requested.

## 9. Opt-out of any promotional or marketing material

9.1. You can Opt-out of any promotional or marketing material at any time either by using the opt-out function detailed in relevant promotional/marketing emails or by contacting the Promoter via the contact form on the Promoter's Website. Please note that the Promoter may still need to send you service notifications by email, such as updates to the Promoter's Privacy & Cookies Policy, and Terms & Conditions.

## 10. General

10.1. The Promoter reserves the right to amend this Privacy & Cookie Policy from time to time. The latest version of the Privacy & Cookie Policy can be found on the Promoter's Website.

10.2. If you wish to contact the Promoter for any reason, please use the contact form on the Promoter's Website: <https://theemperorcollection.com/contact>.

## **Cookie Policy**

### **1. Preliminary**

- 1.1. The Promoter – The Emperor Collection ('TEC', 'We', 'Our') operates multiple Platforms which uses cookies and other tracking technologies.

### **2. What are Cookies?**

- 2.1. Cookies are text files with small pieces of data, that are used to identify platform visits of Users. Specific cookies are used to identify specific Users and improve their web browsing experience. Tracking Technologies are collective pieces of data gained from platforms which identifies Users and their activities on such platforms.
- 2.2. Cookies allows Users to be distinguished from each other when using the Promoter's Platforms and may be used for the following purposes:
  - 2.2.1. The essential running of the Promoter's Platforms.
  - 2.2.2. Effective performance of the Promoter's Platforms.
  - 2.2.3. Improve and personalise your experience on the Promoter's Platforms.
  - 2.2.4. Deliver the latest updates of the Promoters products and services.
  - 2.2.5. Ability to construct a website report, and understand customer platform usage.
  - 2.2.6. Improve and enhance the Promoter's Platforms.
- 2.3. Cookies are enabled upon a User using the Promoter's Platforms, and such cookies may:
  - 2.3.1. Be disabled at the end of your browser session (allowing your activities during that session to be saved – often called "session cookies").
  - 2.3.2. Be stored on your browser/device in between sessions, enabling for a much easier browsing experience and for your platform preferences and actions to be saved for future visits (also known as "persistent cookies"). Such cookies would expire automatically after a set period of time or they can be deleted manually from your browser/device.
  - 2.3.3. Be set by the Promoter, which are often referred to as "first-party cookies".
  - 2.3.4. Be set by third-parties, which are often referred to as "third-party cookies".
- 2.4. The Promoter will not use nor allow any third parties to use any cookies/tracking technologies which are strictly not necessary for the operation of the Promoter's Platforms. Some third-parties (such as advertising networks, and providers of external services like web traffic analysis), may also use cookies/tracking technologies which are enabled before or after your session on the Promoter's Platforms. The Promoter does not have any control over third-party cookies/tracking technologies. By engaging with any third-party cookies/tracking technologies users take full responsibility for their actions and abiding by any terms & conditions, privacy policies, and cookie policies required by such third-party sites.

### 3. What type of Cookies are used?

3.1. The following table sets out the different types of cookies the Promoter uses on any of its Platforms, with the second table setting out the third-party cookies individually.

| Cookie Type            | Purpose   |
|------------------------|---|
| Strictly Necessary     | These are required for the basic operation of the Promoter's Platforms. They include for example: Cookies that enable you to log- in into your TEC account and use the shopping basket when you play in a competition.  |
| Analytical/Performance | These allow platform analysis to be conducted, which helps in improving our Platforms to make them easier and more effective to use.  |
| Functionality          | These allow Users to be distinguished from each other when using the Promoter's Platforms, and thus allowing a more tailored and bespoke platform User experience. They also allow your setting preference to be saved ready for future platform visits.          |
| Targeting              | These allow data to be gathered for platform analysis to be conducted, data such as User platform interactions, and products/services Users have engaged with, help in improving future platform use and advertisements to be more tailored to the platform User. |
| Re-targeting           | These save data to allow future platform use and advertisements to be more tailored to the platform User.   |

| Cookie Name              | Cookie Type            | Purpose  |
|--------------------------|------------------------|--|
| Google AdWords           | Analytical/Performance | Used to track campaign performance.  |
| Google Analytics/Signals | Analytical/Performance | Analysis of User engagement on the Promoter's Platforms. Such as collecting data on the number of Platform Users, and understanding how Platforms are used.      |
| Facebook                 | Targeting              | Tracks the performance of the Promoter's Marketing Campaigns across Facebook and Instagram, for analysis to be conducted and improve future marketing campaigns. |

### 4. Cookies Setting

4.1. You can enable/disable any cookies/tracking technologies via the setting menu on your web browser/device. Some cookies are strictly necessary for the proper functioning of the Promoter's Platforms. If you block all cookies you risk not being able to access all parts of the Promoter's Platforms that are available to you.

### 5. General

5.1. The Promoter reserves the right to amend this Privacy & Cookie from time to time. The latest version of the Privacy & Cookie Policy can be found on the Promoter's Website.

5.2. If you wish to contact the Promoter for any reason, please use the contact form on the Promoter's Website: <https://theemperorcollection.com/contact>.