

# Privacy policy

## Introduction

Welcome to the privacy policy of Wallpaperdirect Inc., a wholly-owned subsidiary of C. Brewer & Sons Limited (Brewers). Wallpaperdirect is the leading online wallcoverings store, built on the expert experience and resources of Brewers, the UK's leading independent decorators' supplier, with more than 170 UK stores and over 100 years of experience in the business supplying wallpaper, paint, decorating supplies, and fabrics to the most demanding professional decorators and homeowners alike. Wallpaperdirect Inc., headquartered in Maynardville, Tennessee, obtains wallpaper orders for Wallpaperdirect customers in the United States and is intended for use by US-based customers. Brewers fulfills orders from US customers and ships wallpaper orders from Brewers locations in the UK. Wallpaperdirect Inc. is referred to in this privacy policy as “Company,” “we,” “us,” or “our.”

Company respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we protect your personal data when you visit our websites, the personal data we collect, how we use and disclose personal data, your privacy rights, and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can [download a pdf version of the policy here](#).

### 1. Important information and who we are

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Company collects and processes your personal data through your use of its websites, including any data you may provide through our websites when you interact with us, for example, sign up to our newsletter, purchase a product or service or take part in a competition.

Our websites are not intended for children and we do not knowingly collect data relating to children. If you believe that we have inadvertently gathered personal data about a child, please contact our data privacy manager using the details set out in the Contact details section below in order for us to delete it

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. These other privacy policies supplement this privacy policy and may provide more context-specific information about our privacy practices relating to particular transactions.

This privacy policy applies to consumer users of the Company's website [www.wallpaperdirect.com](http://www.wallpaperdirect.com) (the, “Website”).

#### **Wallpaperdirect Inc. as the Party Collecting and Using Personal Data (Controller)**

Wallpaperdirect Inc. is the party collecting personal data from US customers and is responsible for their personal data.

We have appointed a data privacy manager who is responsible for overseeing questions regarding this privacy policy. If you have any questions or concerns about this privacy policy, including any requests to exercise rights under this policy or your legal rights under the law, please contact the data privacy manager using the contact information set forth below.

### *Contact information*

Our full contact information:

Full name of legal entity:

Wallpaperdirect Inc., a wholly-owned subsidiary of C. Brewer & Sons Limited

Name or title of data privacy manager:

Group Legal Adviser

Email address:

[help@wallpaperdirect.com](mailto:help@wallpaperdirect.com)

Postal address:

Wallpaperdirect Inc.

PO Box 1258

155 D-2 Durham Drive

Maynardville, TN 37807

Call Toll Free: 1-855-972-9273

### **Third-party links**

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave one of our websites, we encourage you to read the privacy policy of every website you visit.

## 2. The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, and date of birth and, if opening an account, passport number, driving license or similar identification document as proof of identity together with a utility bill as proof of address.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** means information used to pay for products or services, such as payment card information or bank account information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites. We use Google Analytics to collect information about you when you use our website. For a more detailed listing of information collected by Google Analytics, please refer to the article [here](#).
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data under applicable law, because this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel an order for a product or service you have with us but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by postal mail, phone, email or otherwise. This includes personal data you provide when you:
  - purchase or apply for our products or services;
  - create an account on our websites;
  - subscribe to our service or publications;
  - request marketing information to be sent to you;
  - enter a competition, promotion or survey;
  - give us some feedback;
  - We may collect information about your use of coupons and other discounts on our online store, including the number of discounts used, interests and shopping preferences; and
  - If you participate in any surveys, contests, wish lists, fundraising, and other voluntary offerings provided on the Website, we will collect any information you submit as part of such offerings.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and Google Analytics. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see the Cookie section below for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties:
    - a. analytics providers such as Google Analytics;
    - b. advertising networks such as Awin; and
    - c. search information providers such as Google and Microsoft (Bing).
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal and First Data.

- Identity and Contact Data from lead generation campaigns run by third parties such as Hubspot, BPi and Barbour BP.

#### 4. How we use your personal data

We use personal information collected through our Website for purposes described in this privacy policy or disclosed to you on our Website or in connection with the sale of our products and services. For example, we may use your information to:

- operate and improve our Website, products, and services;
- understand you and your preferences to enhance your experience and enjoyment using our Website, products, and services;
- process and deliver contest entries and rewards;
- respond to your comments and questions and provide customer service;
- provide and deliver products and services you request;
- to send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about new contests, promotions, rewards, upcoming events, and other news about products and services offered by our Company and our selected partners;
- link or combine it with other personal information we get from third parties, to help understand your needs and provide you with better service.

We may store and process personal information in the United States and other countries.

#### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

#### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time using the contact information above. In addition, you can also opt out directly with third parties such as Google Analytics Remarketing by using the opt-out browser add-on <https://tools.google.com/dlpage/gaoptout/>

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

#### **Cookies and Other Mechanisms to Collect Technical Data**

##### ***Cookies***

Cookies may be automatically used to collect specific information from a computer or mobile device that accesses and navigates through the Website over time. Information collected by cookies may include information to help improve and customize the content or layout of the Website.

A cookie is a small text file that websites save on a computer's storage device when a website is visited. Cookies cannot be used to run programs or deliver viruses to the computer or mobile device accessing the Website. Users can establish or change their browser settings to refuse cookies. However, refusing cookies may interfere with the full functionality of the Website and limit the user experience.

We use a web analytics service, Google Analytics, to provide Technical Data. The Google Analytics service helps us to evaluate how users view and use our Website. Specifically, it tells us about when and how you use our Website, the website from which you navigated to our Website, information about your system, and your location.

For more information about Google Analytics, please visit:

<http://www.google.com/policies/privacy/partners/>.

You can opt out to prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout>.

#### ***Web Beacons***

We may collect information using Web beacons. Web beacons are electronic images that may be used on our Websites or in our emails. We use Web beacons to deliver cookies, count visits, understand usage and campaign effectiveness and to tell if an email has been opened and acted upon.

#### ***Local Shared Objects***

We may use local shared objects, also known as Flash cookies, to store your preferences such as volume control or to display content based upon what you view on our sites to personalize your visit. Third party partners provide certain features on our Website and display advertising on third party websites based upon your Web browsing activity using Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and way in which data is stored. Cookie management tools provided by your browser usually will not remove Flash cookies. To learn how to manage privacy and storage settings for certain Flash cookies click here: [https://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html#117118](https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118)

#### ***Third Party Cookies***

We may also use third parties to serve cookies our Website. Certain third parties may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our Website (but not your name, address, email address, or telephone number). They do this using cookies, clear gifs, or other technologies. Information collected may be used, among other things, to better understand the usage and visitation of our Website and the other sites tracked by these third parties. This policy does not apply to, and we are not responsible for, cookies or clear gifs in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technology. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <http://www.aboutads.info/choices/>.

#### 5. Disclosures of your personal data

We do not share your personal data with third parties other than as follows:

- with your consent;

- with third party vendors, consultants and other service providers who work for us and need access to your information to do that work;
- to (i) comply with laws, to respond to demands for information required by law, or to respond to administrative or judicial process, (ii) to protect the rights and property of the Company our agents, customers, members, and others including to enforce our agreements, policies and terms of use, (iii) to preserve the security of our Website or social media accounts, resolve disputes, or to assess any possible wrongdoing or (iv) in an emergency to protect the personal safety of the Company, its customers, or any person; and
- in connection with or during negotiation of any merger, financing, acquisition, dissolution, or transaction, reorganization, bankruptcy, or other legal proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company.

We may also share aggregated or deidentified information with our third party partners to analyze how our Website are used and to provide you with additional information that may be of interest to you.

We require all third parties to respect the privacy and security of your personal data and to maintain data protection safeguards consistent with this privacy policy. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

External third parties that may receive your personal data include:

- Service providers acting as processors who provide IT and system administration services (for example, Worldapp and Causeway Technologies Limited), and mailing services (for example, HubSpot, MailChimp and MetaPack).
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Review websites such as Trustpilot.
- Fraud prevention agencies, and credit reference agencies when you apply to open an account with us.

Except as noted above, we will not sell, distribute, transfer, or lease your personal data to third parties.

## 6. Data security

We have implemented reasonable and appropriate security safeguards to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data based on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Data retention

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data, this can be requested via the [contact information](#) detailed above. .

In some circumstances we may anonymize 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 information indefinitely without further notice to you.

## 8. NOTICE TO RESIDENTS OF CALIFORNIA

Some of our customers are located in the State of California. This section applies to California customers receiving products or services ordered from the Company. “Personal information” in this section has the same meaning as the term “personal data” used elsewhere in this policy.

### a) California Consumer Privacy Act (CCPA) Disclosures

#### Categories of Personal Information Collected and Purposes of Use

We have set out below, in a table format, the categories of personal information we collect from California residents, their sources, and the purposes for which the categories of personal information will be used. The table lists the categories of personal information we may have collected from you in the last 12 months if you have been a Website user or a customer of the Company during that time. The table also includes the business or commercial purposes for which personal information will be used or disclosed to third parties. As noted above 5, we do not sell personal information in the ordinary course of business. Also, we have not made any such sales in the past 12 months.

Categories of Personal Information Collected		Purposes of Use
“Identifiers” such as a real name, alias, postal address, customer number, telephone number, email address, and account name. See Section 2 (Identity Data, Contact Data, and Profile Data) above.		See the purposes of use for Identity Data, Contact Data, and Profile Data in Section 4 above.
Internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifiers, or similar technology. See Section 2 (Technical Data) above.		See the purposes of use for Technical Data in Section 4 above.
Information (other than Identifiers already described above) that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to:	Signature	We may collect signatures in connection with orders, for example to prove tax exempt status.
	Bank account number, credit card number, debit card number, or any other financial information. See Section 2 (Financial Data) above.	See the purposes of use for Financial Data in Section 4 above.
Commercial information, including records of products and services purchased, obtained, or considered, or other purchasing or consuming		See the purposes of use for Transaction Data and Profile Data in Section 4 above.

Categories of Personal Information Collected	Purposes of Use
histories or tendencies. See Section 2 (Transaction Data and Profile Data) above.	
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site or advertisement. See Section 2 (Technical Data) above.	See the purposes of use for Technical Data in Section 4 above.
Geolocation data (Internet protocol address). See Section 2 (Technical Data) above.	See the purposes of use for Technical Data in Section 4 above.
Electronic information (see Internet or other electronic network activity in this table above). See Section 2 (Technical Data) above.	See the purposes of use for Technical Data in Section 4 above.
Inferences drawn from other personal information described in this section reflecting customers’ preferences collected in the form of notes in our customer database.	Our records of purchasing patterns may reflect consumer preferences. Also, notes from the Company’s sales team may reflect customer preferences to assist in understanding our customers’ needs and wishes in connection with marketing and selling our products and services.
Context-specific personal information in your communications with us not specifically covered within the categories above. For instance, anything you send us in an email or web form, and your email is Contact Data.	See the purposes of use for Contact Data in Section 4 above. Any information you provide us in a communication will be used for one of the purposes in Section 4, depending on what it is. We will also use such information to reply to your communications.

## CCPA Individual Rights

### Right of Access and Data Portability

In response to a request from a California resident, we will disclose to that resident the categories and specific pieces of personal information we have collected about the resident in the previous 12 months and, we will disclose to the California resident:

- The categories of personal information we have collected about that California resident.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting that California resident’s personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about that California resident.

The California resident must be verified before we can disclose the information requested. See the “Identity Verification” section below.

### Right of Deletion



California residents have the right to request that we delete any personal information that we collected from that California resident and retained by us, subject to certain conditions and exceptions under the law. For instance, we have the right to retain personal information needed to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the California resident, or reasonably anticipated within the context of our ongoing business relationship with the California resident, or otherwise perform a contract between our business and the California resident.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Conduct solely internal uses that are reasonably aligned with the expectations of the California resident based on the California resident's relationship with us.
- Comply with a legal obligation.
- Use the personal information internally, in a lawful manner that is compatible with the context in which the California resident provided it.

The identity of any person making such a request must be verified before we can delete the personal information as requested. See the "Identity Verification" section below.

#### How to Exercise Your Individual Rights Under CCPA

If you wish to exercise any of the rights set out above, please contact us (see Contact information section in Section 1). We will use the procedures in the Identity Verification section below to verify the identity of the California resident or any authorized agent acting on behalf of a California resident.

#### Identity Verification

The Company has an obligation to verify the identity of any individual or agent seeking to exercise rights under the California Consumer Privacy Act (CCPA).

We will follow the following procedures to verify the identity of an individual purporting to be a California resident:

- We will verify your identity in response to a request to exercise your individual rights by requiring that you to provide two pieces of information that we already have on file with you, which may include:
  - Items of contact information, or
  - Content in communications you sent to us.
- In addition, in the case of a request for specific pieces of personal information, we will ask for an additional piece of information that we may have in addition to the two pieces requested above, together with a signed declaration under penalty of perjury that the requestor is the consumer whose personal information is the subject of the request or an authorized agent acting on behalf of that consumer.
- In addition to these procedures, we may ask you to provide a copy of an identification credential, such as a passport or driver's license. We will use any such copies of credentials strictly for identity verification purposes, and it will be deleted following the completion of the verification process.

If we receive a request to know specific pieces of personal information about a household or a request to delete household information, the following conditions will apply:

- All California resident members of the household must jointly request the specific pieces of personal information or deletion of household personal information;

- We must have verified the identity of all the members of the household in accordance with this section; and
- We must be able to verify that each member making the request is currently a member of the household. We will verify membership in a household by checking if an individual has the same address information as the household or some other evidence of sharing the same household.

An authorized agent seeking to exercise rights on behalf of an individual California resident must prove the agent’s authority by either seeing proof of the agent’s authority under a power of attorney made pursuant to the California Probate Code Sections 4121 through 4130, or by the following procedures:

- Providing a copy of a writing signed by the resident giving the agent permission to act on the resident’s behalf;
- Verification of the California resident’s identity and the authorized agent’s own identity under the procedures in this section; and/or
- Communicating with the California resident directly to confirm the status of the agent as authorized to act on behalf of the resident.

We will not provide or delete information as requested if we are unable to verify the identity of the requestor as required above, if an agent cannot prove authority to act on behalf of an individual, or we have reason to believe that the request is fraudulent. We may ask for additional verification if we suspect fraud, such as a copy of an identification credential from the requestor, or an additional identification credential if we have already obtained a copy of one credential. We will use any such additional information strictly for identity verification purposes, and it will be deleted following the completion of the verification process.

#### Policy Against Discrimination

The Company will not discriminate against individual California residents for exercising any of their rights under the CCPA, including by:

- Denying goods or services to the California resident
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services
- Suggesting that the California resident will receive a different price or rate for goods or services or a different level or quality of goods or services

#### Notice Concerning “Do Not Track” Settings

Under California law, online service providers must disclose in their privacy policies how they respond to “do not track” settings. These are settings users can set in their browser software. Currently, there is no standard governing what, if anything, a website operator should do when receiving a “do not track” signal. Consequently, the Company does not currently take action in response to a “do not track” browser setting. As industry standards regarding do not track settings emerge, the Company will revisit and amend this policy to account for these emerging standards.

#### 9. NOTICE TO EUROPEAN USERS

YOU EXPRESSLY CONSENT TO COMPANY’S PROCESSING OF YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY POLICY. YOUR PERSONAL DATA MAY BE PROCESSED BY COMPANY IN THE COUNTRY WHERE IT WAS COLLECTED AND IN THE UNITED STATES. UNITED STATES LAWS REGARDING PROCESSING OF PERSONAL DATA MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

IF YOU REPRESENT AN ORGANIZATION, YOU WILL BE RESPONSIBLE TO ENSURE THAT EACH MEMBER OF YOUR ORGANIZATION (INCLUDING EMPLOYEES AND CONTRACTORS) ABOUT WHOM PERSONAL DATA MAY BE PROVIDED TO COMPANY HAS GIVEN HIS OR HER EXPRESS CONSENT TO COMPANY'S PROCESSING OF SUCH PERSONAL DATA.

## 10. Controlling Your Personal Data

You may choose to control your personal data in the following ways:

- If you would like access to personal data about you we may have in our possession, please contact us at the contact information in Section 1.
- You may also contact us to correct or update personal data about you in our possession. Please keep in mind that we may have a legal right or obligation to preserve personal data as it currently exists.
- You may opt out of communications from us, as described in Section 4, although opt out requests will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.
- If you have previously agreed to us using your personal data for direct marketing purposes, you may change your mind at any time by contacting us at the contact information in Section 1.

## 11. Questions or Complaints

Please direct all questions or complaints about our privacy practices to our privacy team by contacting our data privacy manager at the contact information in Section 1.

If you have a complaint, please provide information relevant to your complaint. Our privacy team will evaluate your complaint based on the information you provide and send you a response. We may need to ask you for additional information to evaluate your complaint. We will promptly investigate and respond to your communications about a complaint. You may have other rights under law and the right to contact the privacy regulator in your jurisdiction about your complaint.

## 12. Changes to this policy

We may revise this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post the revised policy here. As we may make changes at any time, we suggest that you periodically consult this Privacy Policy. Please note that our rights to use your personally identifiable information will be based on the privacy policy in effect at the time the information is used. If we make any material changes in the way we use your personally identifiable information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on our Website. Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on our Website. These changes will be effective immediately for new users. If you object to any such revisions you must cease using our Website. Continued use of our Website following notice of any such revisions shall indicate your acknowledgement of such revisions and your agreement to be bound by the terms and conditions of the revised Privacy Policy.