

CROSTOWN

Introduction

We take privacy seriously at Crosstown. Dough Limited (referred to as "Crosstown," "we," "us," or "our"), and we are dedicated to protecting it. This policy explains when and why we collect personal information about individuals, how we use it, when it may be disclosed to others, and how we keep it secure.

In connection to the processing activities detailed below, Crosstown (company number 08831327) is the Data Controller. This means that we are in charge of deciding why and how your personal data is used.

This policy may be updated from time to time, so please revisit this page to ensure you're satisfied with any changes. For further details, please review the revisions to this policy

1. PERSONAL DATA THAT WE COLLECT:

Crosstown collects Personal Data to provide you with our services and sell our product. The collection of Personal Data is only used for these purposes.

1.1 WHAT PERSONAL DATA THAT WE COLLECT:

- Name
- Card holder and payment details
- Details of the orders you place and transactions
- Legal Information regarding claims made by you or against you as well as the claims in

process



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- Marketing preferences
- Web Browser type and version (automatically collected)
- Operating system
- A list of URLs starting with the referring site, your activity on the website, and the site you exit to (automatically collected)
- Geographic information

1.2 HOW WE COLLECT PERSONAL DATA

- Data us given to us by you
- Data is received with your permission by third parties (such as online collaboration with other brands)
- Data that's available publicly available online
- Data collected automatically.

1.3 CROSSTOWN WILL COLLECT YOUR PERSONAL DATA IN A NUMBER OF WAYS, SUCH AS:

- When you contact us through the website, by telephone, post email or through any other means:
- When you register with us and set up an account:
- When you enter a competition or promotion through a social media channel
- When you use our services



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- When you elect to receive marketing communications from us
- When you enter competitions with brands that we are collaborating with us on the same competition
- Data that we receive from publicly available third parties' sources such as Social Media websites such as Meta.

In each case, in accordance with this policy

1.4 DATA RECEIVED FROM THIRD PARTIES

When collecting Personal Data from third parties such as Brands collaborating with us on Online Competitions, we have a contract in place with those companies that outlines that any Data provided as to have the consent from the Individual.

1.5 DATA THAT WE RECEIVE FROM PUBLICLY AVAILABLE THIRD-PARTY

Social Media websites such as Meta provide us with third party data that is publicly available.

We might collect free Corporate Data available online to establish the first contact point to sell our products as we believe it's for your best interests to have access to our offers. At any point you can opt out for further communications by unsubscribing on the link provided with the email sent.

1.6 DATA THAT WE COLLECT AUTOMATICALLY

When you access the Website, we will collect your Data (if you have provided consent) for example:

- Collect some information about your visit to the website. This information helps us make improvement on our website content and navigation.



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- The data collected by visiting Crosstowns website is IP Address, date and times and frequency with which you access the website and the way you use and interact with the content.
 - We will collect your data via cookies, in line with the cookie settings on your browser.
- For more information, please head to the “Cookies” section.

2. OUR USE OF DATA

All the data collected and processed by Crosstown is done to provide you with a better user experience on our website and to process your orders and request of services, The use of Personal Data is only used for these purposes.

Specifically, Data may be used by us for the following reasons:

- Internal record keeping
- Process your orders
- improvement of our products/ services and our Website..
- Transmission of marketing material that may be of interest to you.
- To correspond and communicate with you
- Management of complains and claims.
- Vital interests – If there’s any urgent safety or product recall notice to communication in regards of a product purchased by you.
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2.1 MARKETING ACTIVITIES AND ESSENTIAL BUSINESS ACTIVITIES.

When we use your Data for the purposes above, we deem it necessary to do so for our legitimate interest. If you are not satisfied with this, you have the right to object in certain circumstances (see the sessions headed “your rights” below).



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2.2 ALL MARKETING COMMUNICATIONS HAVE BEEN CONSENTED BY THE RECEIVER.

THIS IS ACCOMPLISHED VIA AN OPT IN OR SOFT OPT IN.

- SOFT OPT IN: Specific type of consent which applies when you have previously engaged with us (for example, you contacted us to ask for more details about a product/service and we are marketing similar products/services). Under the soft opt in consent, unless you opt-out we will continue communicating with the service user.

- OPT-IN: For other types of E- Marketing, the Data is acquired via explicit consent. This means the service user has taken a positive and affirmative action to giving consent. An example of this is checking a tick box we have provided (for example the subscription of our Newsletters).

If you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see section headed “your rights” below.

We might use your data to show you Crosstown adverts and other content on other websites. If you do not want us to use your data to show Crosstown adverts and other content on websites, please turn off the relevant cookies (please refer to session headed “Cookies”).

3. WE SHARE DATA WITH:

We might share your data with the following group of people:

- Our employees, agents and/or, professional advisors, third party Company – to carry business operations, including marketing activities, fulfilling orders and responding to enquires from customers
- Only when the user has consented, we might share your Data with Collaborating Brands/ Companies to carry out campaigns and operations.



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- Third party service providers who provide services to us which require the processing of Personal Data to carry out the necessary business activities (for example Stripe, platform use to collect online payments or Orlak our Online Customer Service app).
- We might need to transfer your Personal Data to a third party in case of sale of some or all of our business and assets.

4. KEEPING DATA SECURE

We exercise caution to protect your information from unauthorised access, unlawful processing, loss, destruction, or damage. We will keep your information for as long as the law requires or for a reasonable period.

When you have an account with us your username and password are unique to you and you are responsible for maintaining your password. We do not recommend that you share your password with anyone.

Unfortunately, information transfer over the internet is not entirely secure. We will take reasonable steps to protect your information, but we cannot guarantee the security of any information you transfer to the Website; any transfer is at your own risk.

We will employ stringent internal procedures and security mechanisms (ensuring our servers are secure) to act to prevent unauthorised access once we have collected your information.

We have in place Company's Policies and Procedures to deal with any suspected Data Breach. If you suspect any misuse or loss or unauthorised access your Data please let us know immediately by contacting by via this email address: DPO@Crosstown.co.uk

5. DATA RETENTION



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Unless a longer period is required or permitted by law. We will only hold onto this data for the necessary time to fulfil the outlined proposal of this policy unless you request this data is deleted.

Even if we delete your Data, it may persist on back up or media archival for legal, tax and regulatory purposes.

6. YOUR RIGHTS

YOU HAVE THE RIGHT TO:

- ACCESS – you can ask for us to provide you with all the Data we hold from you. To do so you should email DPO@crosstown.co.uk. This can take up to a month and might have de charge of £10 to meet the cost in providing you with details of the information we hold on you.
- CORRECT – At any point you can contact us to update your Data if its inaccurate or incomplete. To do so please email DPO@Crosstown.co.uk.
- ERASE – you can request that your Data is erased from our systems. Please note that we might be requested by Law to keep some of your Data to be complainant with the Law. We might keep essential Data from you in the systems to avoid further contacts.
- RESTRICT OUR USE OF YOUR DATA – At any point to opt out from us using your Data.
- RIGHT DATA PORTABILITY- You can request us to move, copy or transferer your Data. To do so we might ask for you to provide us with additional Data so we can verify your Identity to exercise your request.
- OBJECT. – you can object to our use of your Data including where we use it with legitim interest.

If you are not satisfied with the way, we handle a complaint made by your in relation to our your of your Data you should contact ICO (Information Commissioner’s Office) (www.ico.org.uk) Uk’s Data protection Authority.



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7. LINKS TO OTHER WEBSITES

Our webstore may from time to time provide you with links to other websites. We have no control over such websites and it's not our responsibility for their content. This Privacy Policy doesn't extend to those Websites, we advise you to read the Privacy Notes on their websites priori to using them.

8. COOKIES

8.1 WHAT ARE COOKIES

When you visit certain online websites, small text files called cookies are stored on your computer. Cookies are used by Crosstown to keep track of what's in your basket and to remember you and your preferences when you visit our site. If you want to know more information in regard to Cookies please visit ICO's Website: <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>

8.2 WHAT IS THE PURPOSE OF COOKIES?

8.2.1 WE USE COOKIES to help us improve the efficiency of our site and give you a better experience for users, identifying and resolving faults, or determining relevant connected products to display you when you're browsing. Cookies are widely used to improve the efficiency of websites as well as to supply website owners with various types of information.

The Data obtained by cookies won't be shared or sold to third parties unless we are required by law to provide it (for example to government bodies and law enforcement agencies).



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In exceptional cases, we may also use cookies provided by third parties we trust. The section following explains the third-party cookies you can encounter while browsing this site.

8.2.2 WE DON'T USE COOKIES TO:

- Collect any personal identifiable information (without your consent)
- Collect sensitive information (without your consent)
- Share personal data with third parties unless requested by Law

8.3 THERE ARE 4 TYPES OF COOKIES:

- Necessary cookies
- Functionality cookies
- Analytical/Performance
- Targeting

For more information please visit: <https://gdpr.eu/cookies/>

8.3.1 WE HAVE FUNCTIONALITY COOKIES AND NECESSARY COOKIES.

We do not need your permission to use these necessary cookies, but you can disable them if you choose by changing your browser settings as described below, though doing so would likely result in our site not functioning as intended.

8.3.2 AT CROSSTOWN WE USE ANALYTICAL/PERFORMANCE AND TARGETING COOKIES

8.3.2.1 ANALYTICAL/PERFORMANCE



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- We use Google Analytics, which is one of the most widely used and trusted advanced analytics on the web for assisting us in greater understanding how you use the site and how to improve it. These cookies may keep track of things like how long you spend on the site, and which pages you visit so that we can keep creating interesting content for you. Visit the official Google Analytics page for more information about Google Analytics cookies.

- This website also contains social media tracking and/or plugins that interacts with social networks/platforms in a variety of ways. For these to function, the following social media sites will set cookies through our site: Facebook, Instagram, Twitter, LinkedIn, and Pinterest. These cookies may be used to track your usage of our site, optimise your social media profiles, or contribute to the data they hold for various purposes outlined in their respective privacy policies.

8.3.2.3 **AS TARGETING COOKIES**, we use the Meta Cookies to measure ad performance, create custom audience for advertising purposes, and to Improve our service.

While using the website you must opt in to have this type of cookies from Crosstown. At any point you can retract your consent, please see bellow how.

9 TURN OFF COOKIES

You can not agree to the use of cookies as well as withdraw their use. Please find bellow how to. You can typically disable cookies by changing the settings in your browser. You can accept or deny cookies through these options or enable your browser to prompt you before accepting a cookie from a website. If you disable cookies completely in your browser, you may not be able to access all the website's features. Any cookies that have been installed in your browser's cookie folder can be deleted. If you want to delete them, you can do it by managing the setting on your browser.

10 UPATES (Cookies)



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We may update the cookies we use after your first visit to the website. This cookies policy will always inform you about who is placing cookies, why they are being placed, and how to disable them, so you should review it periodically.

11.CHANGES IN THIS POLICY

We may alter this policy from time to time, and any changes will be communicated to you through an updated version on our website as well as by email. Any revisions will take effect seven days after we send you an email or post the new terms on our website , whichever comes first. When you visit our website, we urge recommended you check for updates and review this policy on a frequent basis. If you disagree with any part of the amended policy, you must contact us immediately and stop using our services.

Maria Pimentel last revised this policy on July 22, 2020.



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