



TOWER MINT LTD TOWER HERITAGE CENTRE 1-21 CAREW STREET LONDON SE5 9DF
Tel: 020 7733 7268 Fax: 0207 274 0151 email: info@towermint.co.uk website: www.towermint.co.uk
REG OFFICE AS ABOVE REGISTERED NUMBER: 1276974 VAT NO: 548 0743 32

General Data Protection Regulations

Privacy and Cookies

The Tower Mint Limited, which this privacy policy covers, collects personal data when you make an enquiry, register with us or place an order for products or services.

We will use this data to provide the information, products or services requested, maintain our records and, if you consent, to keep you up to date with information about our products, services, offers and news that may be of interest to you.

When we ask you for personal data, we will ensure it is:

- Processed lawfully, fairly and in a transparent manner
- Collected only for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for the purposes for which it is processed
- Accurate and up to date
- Not kept in an identifiable form longer than is necessary for the purposes for which you provided it
- Secured by appropriate technical and organisational measures
- Not transferred without adequate protection

It is important that we keep your information accurate and up-to-date and so in return, we ask you to:

- Give us accurate information
- Notify us as soon as possible of change of details i.e. new address, new email

Who are we?

Any Personal Data provided to, or gathered by, The Tower Mint Limited is controlled by The Tower Mint Limited and registered in England and Wales with company number 1276974 whose registered office is at Tower Mint Ltd, 1 -21 Carew Street, Camberwell, London SE5 9DF, United Kingdom.

Any Personal Data provided to, or gathered by, Tower Mint Limited is controlled by us.

Information Commissioner's Office Registration Number: Z2749735

For further information regarding this policy, please contact our Data Protection Officer at the above listed address or using the following telephone or e-mail address:

- Telephone 0845 60 88 300
- Email: info@towermint.co.uk

Why do we collect personal data?

We collect personal data when you make an enquiry, register with us or place an order for products or services. We will use this information to provide the products or services requested, maintain records and, if you consent, to keep you up to date with information about our products, services and offers that may be of interest to you.

In order to better understand you as a customer we may combine the data that we collect directly from you from your interactions with Tower Mint Limited, with data that we obtain from third parties. We do this to help ensure that we send you information of our products, services, offers and news that is most relevant to your interests. We are allowed to do this as part of our legitimate business interests in understanding our customers. You are able to update your personal data and adjust your contact preference at any time, please see **“How can I access or correct my Personal Data, request that it be deleted, ask for it to be transferred to another organisation or exercise any of my other rights?”**

Personal data is any information identifying you or information relating to you that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access.

Personal Data includes special categories of personal data and pseudonymised personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed.

Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Special categories of personal data is information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions.

Pseudonymisation or pseudonymised is the replacing of information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is kept separately and secure.

Please note that if you do not share your personal data or adjust your contact preferences, we may not be able to provide you or have to stop providing you with the information, products or services that you have requested.

* Up until 25th May 2018, we may still keep existing customers informed of our products, services and offers if they have not previously opted-out of receiving this information. If you are an existing customer and do not wish to receive information about our products, services and offers that may be of interest to you, please let us know by e-mailing info@towermint.co.uk or writing to Customer Services Team, Tower Mint Ltd, 1 -21, Carew Street, London, SE5 9DF. After this date if you have not indicated that you wish to continue to be informed of our products, services and offers, we will cease to contact you in this respect.

What types of personal data do we collect?

The types of personal data that we collect include personal details including contact information, age, user activity details and user preferences, device details, electronic identification data including IP

address and information collected through cookies, credit and debit card information and payment details, and contractual details including goods and services provided. We will not reuse your personal data for a new purpose other than for what it was originally collected, unless the new use is compatible with the original purpose for which the personal data was collected, we have notified you of the new use and given you a reasonable opportunity to object to it, or the new use is otherwise permitted or required by law.

We collect and process your personal data based on one or more of the following reasons:

- It is necessary for us to perform a contract that you have entered into with us, or because it is necessary before entering into a contract;
- You have given us consent to process your personal data for a specific purpose;
- The processing is necessary for us to comply with our legal obligations;
- We have a legitimate interest to do so, and have taken your rights into consideration; and/or
- The processing is necessary to protect your vital interests.

For further information on which basis we have collected and processed your personal data, please contact us.

How do we use cookies and similar technologies?

When you visit our websites your IP address (the internet address of your computer) is logged to track your session. This is automatically recognised by the web server and is used for system administration and to provide statistics, which Tower Mint Ltd uses to evaluate use of the site.

Our websites also use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies are small text files made up of letters and numbers that are stored on your computer, tablet or mobile device when you visit particular webpages.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include cookies that enable you to log into secure areas of our website, use a shopping cart or make use of the payment services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Your computer, tablet or mobile device will need to accept cookies to enable online shopping and the personalised features found on our websites.

Your browser can be used to restrict, block or delete cookies from towermint.co.uk or any other website, if you would prefer this. This differs from browser to browser, please consult your web browser's 'help' documentation or alternatively you can visit www.aboutcookies.org for more information on how you can delete and control the cookies that are stored on your computer.

The information that we collect and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or e-mail address.

Cookies store a generated 'key' which is associated with all this information.

We also use pixels, or transparent GIF files, to help manage online advertising. These GIF files are provided by our advertisement management partners. These files enable our partners to recognise a unique cookie on your web browser, which in turn enables us to learn which advertisements bring users to our website. The cookie was placed by us, or by another advertiser who works with our partners.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below.

Website Tool	Description
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Google Analytics	Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. For more information visit: https://www.google.co.uk/analytics/#?modal_active=none
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Google Tag Manager	Google Tag Manager is a tag management system that allows you to quickly and easily update tags and code snippets on a website or mobile app, such as those intended for traffic analysis and marketing optimisation. For more information visit: https://www.google.co.uk/analytics/tag-manager/
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Adwords conversion pixel	AdWords conversion tracking shows you what happens after a customer clicks on an ad – whether they purchased a product, signed up for your newsletter, called your business, or downloaded your app. For more information visit: https://support.google.com/tagmanager/answer/6105160?hl=en
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Google Dynamic re-marketing	Dynamic re-marketing allows you to show previous visitors ads based on products or services that they viewed on a website. For more information visit: https://support.google.com/adwords/answer/3124536?hl=en&ref_topic=3180758
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GA Audience	Google Analytics audience reports provide insight into characteristics of a company's website users. For more information visit: https://support.google.com/analytics/answer/1012034?hl=en
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Yahoo DOT tag	Dot Tags are Yahoo's universal tracking tag. DOT tags are used to track performance and optimise search, native and display campaigns. For more information visit: https://developer.yahoo.com/gemini/guide/v1-api/dottags/
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Yahoo Analytics	Yahoo Analytics is a web analytics service offered by Yahoo that tracks and reports website traffic to inform decision making and strategy. For more information visit: https://policies.yahoo.com/us/en/yahoo/privacy/topics/analytics/index.htm
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DoubleClick	DoubleClick is a business owned by Google which develops and provides internet ad serving services. DoubleClick allows clients to traffic, target, deliver and report on their interactive advertising campaigns. For more information visit: https://www.doubleclickbygoogle.com/
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BingAds BingAds is a service that provides Pay Per Click advertising on both Bing and Yahoo! Search engines. For more information visit: <https://secure.bingads.microsoft.com/>

DC StormIQ Formally known as DC Storm, Rakuten Attribution arms digital businesses with performance measurement tools, analysis and reporting to power great decision making and drive success. For more information visit: <https://dc-storm.com/en-uk/about-us/>

iPerceptions iPerceptions is a tool that makes it easy for businesses to collect client feedback and measure them to access customer satisfaction. For more information visit: <https://www.iperceptions.com/>

Linkshare Rakuten Linkshare is an affiliate marketing service provider that connects advertisers to publishers to reach new audiences and influence repeat purchases. For more information visit: <https://rakutenmarketing.com/en-uk/affiliate>

Hotjar Hotjar is a powerful tool that reveals the online behaviour and voice of website users using heatmaps, surveys, polls and visitor recordings. Hotjar can be used to improve a site's user experience and performance/conversion rates. For more information visit: <https://www.hotjar.com/>

Monetate Monetate is an optimisation and personalisation platform that can be used to improve the customer journey and experience. For more information visit: <https://www.monetate.com/about>

Crazy Eg Crazy Egg is an online application that provides eye tracking tools such as a heat map, scroll map, overlay, and confetti to track a website's operation. For more information visit: <https://www.crazyegg.com/>

Qualaroo Qualaroo is a real time feedback platform that enables companies to gain valuable insights from their prospects and customers through customer decision analysis. For more information visit: <https://qualaroo.com/features/>

Ethnio Ethnio is an research recruiting tool for intercepting people that use your interface from your web site or app, and then conducting some kind of research with them - moderated or automated. For more information visit: <https://ethn.io/>

Facebook Pixel Facebook pixel is an analytics tool that helps measure the effectiveness of Facebook advertising. For more information visit: <https://www.facebook.com/business/help/742478679120153>

Third-party cookies

When you visit our websites you may notice some cookies that aren't related to us. If you visit a web page that contains content which is embedded from other websites, for example YouTube or Vimeo, you may be sent cookies from these sites. We do not control these cookies and we would suggest that you visit these sites to view information about their cookies and how they are used.

We do have relationships with select suppliers who may also set cookies during your visit to be used for marketing purposes, such as showing you our products depending on what you seem to be interested in.

Social Media sharing

If you share our content with friends through social networks – such as Facebook and Twitter, you may be sent cookies from these websites. We don't control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

How do we ensure your personal data is accurate?

The majority of the personal data that we collect is collected directly from you, in which case you are responsible for its accuracy. We encourage you to tell us as soon as possible if there are any changes to your personal data, such as a new address. When information is found to be inaccurate, either through our own checks or following a communication from you, it is updated.

Who might we share your information with?

We do not sell, rent or otherwise trade your personal data with others. While most of our work is done by our employees who access your personal data directly from our systems which are under our direct control, we do use third-party service providers to perform certain functions on our behalf.

We have listed below the types of providers, the types of information that they would have access to and the purpose for the transfer of your personal data.

Order Fulfilment would have access to your personal details including contact information, goods and services requested. The purpose for this type of transfer would be to prepare and deliver the products and/or services that you have requested.

Payment Processing would have access to your personal details including contact information, credit/debit card information, and payment details. The purpose of this type of transfer being to process your payment for the products or services provided.

Professional Services would have access to your personal details including contact information. The purpose of this type of transfer being to ensure our compliance with our legal obligations (including anti-money laundering and counter-terrorist financing verification) and/or to assess your suitability for credit (if you have applied for an interest free account).

Communications and Marketing would have access to your personal details including contact information. The purpose of this type of transfer being to send you information regarding our products and services, analysing data (including removing repetitive or out of date information from customer lists) and providing marketing assistance.

IT Support would have access to the personal data in our custody with which we require support. The purpose of this type of transfer being to resolve IT issues in order to provide the products and services that you have requested.

Data Storage would have access to all the personal data in our custody. The purpose of the type of transfer would be to provide us with secure data storage and back-up.

Such companies and individuals will only have access to the personal data needed to perform these functions, they may not use it for any other purposes and are required to process the data in accordance with data protection laws and regulations applicable in the United Kingdom.

For further information on which service providers may have access to your personal data, please contact us.

Please note that if we are requested by the police, government, regulatory, or other body investigating suspected illegal activities to provide your personal data and/or user details, we are entitled to do so.

What do we do with your information?

We will use your personal data for the following purposes:

- Processing your order/request for products and/or services;

- Administer our websites, including providing our website content and advertisements;

- Fulfil our legal obligations; and

- If you consent and are above the age of 18, to provide you with information on our products, services, offers, and news *.

* Up until 25th May 2018, we may still keep existing customers informed of our products, services and offers if they have not previously opted-out of receiving this information. If you are an existing customer and do not wish to receive information about our products, services and offers that may be of interest to you, please let us know by e-mailing info@towermint.co.uk or writing to Customer Services Team, Tower Mint Ltd, 1 -21 Carew Street, London SE5 9DF. After this date if you have not indicated that you wish to continue to be informed of our products, services and offers, we will cease to contact you in this respect.

Credit Account Customers

If you apply for a credit account we will use credit scoring to assess your application. The credit score will be provided by a credit reference agency. Your credit score will be used by us in conjunction with information that you provide as part of your application, along with information regarding your account conduct (if an existing customer), and official public records such as fraud and insolvency records. The use of credit scoring helps us make fair and responsible lending decisions. If your application for credit is declined you are able to request that this is reconsidered, based on a change of circumstances or a correction of your credit report (if an error was found). The credit scoring used is regularly tested by the professional services provider to ensure that it remains fair, effective and unbiased.

For further information on how to appeal a decision or on the credit scoring service used, please contact us.

Do we transfer information between countries?

www.towermint.co.uk

It may sometimes be necessary to transfer your personal data overseas. When this is needed your personal data may be transferred to countries or territories outside of the EEA. Any transfers made will be in full compliance with all aspects of the data protection laws and regulations applicable in the United Kingdom.

We may only transfer your personal data outside the EEA if one of the following conditions applies:

- The European Commission has issued a decision confirming that the country to which we transfer personal data ensures an adequate level of protection for the data subject's rights and freedoms: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

- Appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses, an approved code of conduct or a certification mechanism;

- You have provided your explicit consent to the transfer after being informed of any potential risks; or

- The transfer is necessary for one of the other reasons set out in the GDPR including the performance of a contract between us and you, reasons of public interest, to establish, exercise or defend legal claims, to fulfil our legal or regulatory obligations, or to protect your vital interests where you're physically or legally incapable of giving consent and, in some limited cases, for our legitimate interest.

For further information on which countries your personal data may be transferred to and the specific safeguards that are in place, contact us.

How long do we keep hold of your information?

We keep your personal data for as long as we need it to satisfy our business and legal requirements. Once the personal data is no longer required, it is either deleted or anonymised.

It is important to note that all employees at Tower Mint Ltd follow an organisation-wide security policy. Only employees authorised are provided access to personal data and these employees will have agreed to ensure confidentiality of this information.

Also specifically with respect to debit and credit card information submitted through our websites, we use secure socket layer technology to protect that information.

What rights do I have in relation to the personal data you hold about me?

Unless subject to an exemption, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Tower Mint Ltd holds about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time where we are relying on your consent as the legal basis for processing your personal data;
- Where applicable, the right to request that we transfer your personal data directly to another data controller, (known as the right to data portability);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data where processing is based on legitimate interests, the performance of a task in the public interest/exercise of official authority, direct marketing and processing for the purposes of scientific/historical research and statistics;
- The right to lodge a complaint with the Information Commissioner's Office.

How can I access or correct my Personal Data, request that it be deleted, ask for it to be transferred to another organisation or exercise any of my other rights?

You can update your personal data at any time by:

- Telephone: 080207 733 7268
- E-mail: info@towermint.co.uk

•Mail: Customer Services, Tower Mint Ltd, 1 -21 Carew Street, London, SE5 9DF

Please note that it may take up to 48 hours to update your details.

For further information regarding this policy, to access your personal data, request that it be deleted, or ask for it to be transferred to another organisation, please contact the Data Protection Officer by using the above mentioned contact details.

How can I make a complaint about how you have handled my personal data or responded to a request to exercise my data subject rights?

If you are dissatisfied with the handling of your personal data or how we have responded to a request to exercise your data subject rights, you have the right to ask for an internal review. An internal review will consider whether or not your personal data and/or request were handled appropriately, in line with applicable data protection laws and regulations.

Internal review requests should be submitted to the Data Protection Officer by using the contact information above. Internal reviews will be carried out by the Finance Director. We aim to respond within 20 working days of the receipt of the request for an internal review.

If you are dissatisfied with the outcome of the review, then you may seek a review by the Information Commissioner's office, which has the powers to uphold or overturn the decision. Please see ICO contact information below. Tower Mint will abide by the decisions of the ICO, unless it considers itself to have grounds for an appeal to the First-Tier Tribunal (Information Rights).

•Website: <https://ico.org.uk>

•E-mail: casework@ico.org.uk

•Telephone: 03031231113

•Mail: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Last Updated: 01/05/2018