

## INTRODUCTION

Absolutely Fabulous Ltd (“ABFAB” “us”, “we”, or “our) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and will only collect and use your personal data in ways that are described within this Privacy Policy (the “Policy”). We shall only process your data in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017 (“the Law”) and other data protection laws as applicable.

## WHAT IS PERSONAL DATA?

“Personal Data” is any information relating to a Data Subject (i.e. the natural person whose personal data is being collected, held or processed), in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Data includes data relating to a living individual who can be identified from that data alone or from that data and other information in our possession. Personal Data can be factual (for example, a name, address, date of birth, race, religion, or mobile device IDs) or it can be an opinion about that person, their actions, and/or behaviour.

## WHAT DOES THIS PRIVACY POLICY COVER?

The purpose of this Policy is to describe how Absolutely Fabulous Ltd complies with the Law with regards to any personal information provided to us. This Policy applies to the collection and use of Personal Data relating to living individuals and explains how we collect, hold, and process your Personal Data. It also explains your rights under the law relating to your Personal Data.

Under the law, Absolutely Fabulous Ltd is known as a “Controller”. Controllers are the people/ organisations that determine the purpose and the way in which, (i.e. how and why), any Personal Data is processed.

## WHAT PERSONAL DATA IS COLLECTED?

We may collect some or all of the following Personal Data (this may vary according to your relationship with us):

- Name
- Date of birth
- Gender
- Address to be verified
- Nationality
- E-Mail address
- Telephone number
- Business name
- Job title
- Profession
- Payment information
- Residence Certificate or Employment Permit

Personal Data which is recognised by the Law as being more sensitive is categorised as “Special Category Data” is only collected in order to exercise any right or power, or perform or comply with any duty, conferred or imposed on the Controller by an enactment) in accordance with Schedule 2, Part II of the Law.

#### HOW YOUR PERSONAL DATA IS COLLECTED?

- We collect Personal Data from our customers in a number of different ways, such as:
- Your interaction with us, including telephone, email, and the use of our website
- Contact forms on our website
- Sources that are accessible to the public such as social networks, the internet and/ or any commercial registers
- Data analytics providers
- Credit reference agencies

#### HOW WE USE YOUR PERSONAL DATA

Under the Law, we must always have a lawful basis for using your Personal Data. This may be because the data is necessary for our performance of a contract with you, where we need to comply with a legal obligation, because you have consented to our use of your Personal Data, or because it is in our legitimate business interests to use it. Data may also be used where we need to protect your interests or if it is in the public interest to do so. Your Personal Data will be used for and/or may be used for one of the following purposes:

- Providing and managing your relationship with us
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you
- Personalising and tailoring our services for you
- Communicating with you. This may include responding to e-mails or calls from you
- Supplying you with information by e-mail and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us by your preferred method)
- Conducting data analytics

With your permission and/or where permitted by law, we may also use your Personal Data for marketing purposes, which may include contacting you by e-mail, post, text message, or telephone with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Law and you will always have the opportunity to opt-out / withdraw consent. To do so, please email [info@abfabguernsey.com](mailto:info@abfabguernsey.com).

#### HOW WE USE SENSITIVE PERSONAL DATA?

As mentioned above, Special Category Data requires higher levels of control. We will only process Special Category Data under the following conditions:

- With explicit consent from you;
- To comply with legal obligations;
- Where it is in the public interest;
- In response to a legal claim to protect your interests when you may not be able to give consent; or
- The information is already in the public domain.

Any concerns a customer may have about how Absolutely Fabulous Ltd use any Special Category Data may be raised on an individual basis.

#### HOW LONG WE RETAIN YOUR PERSONAL DATA

We will not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected, including satisfying any legal, accounting or reporting obligation. Details of the various retention periods are listed in the Retention section of our Data Protection Policy and are available from our Data Protection Responsible Person on request.

#### HOW AND WHERE WE STORE OR TRANSFER YOUR PERSONAL DATA

We store or transfer your Personal Data within the European Economic Area (“EEA”) and the Channel Islands. This means that it will be fully protected under the Law.

#### HOW WE SHARE YOUR PERSONAL DATA

We will not share any of your Personal Data with any third-parties for any purposes other than to facilitate our services.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your Personal Data is required by a third-party, as described above, we will take steps to ensure that your Personal Data is handled safely, securely, and in accordance with your rights, our obligations, and the third-party’s obligations under the Law, as described above.

#### WHAT ARE YOUR RIGHTS?

- Under the Law, you have the following rights, which we will always work to uphold:
- Right to Access and port your Personal Data
- Right to object to the processing of your Personal Data
- Right to rectification of your Personal Data
- Right to request for your Personal Data to be erased
- Right to restrict the use of your Personal Data
- Right to lodge a complaint about our use of your Personal Data with The Office of the Data Protection Authority ([www.odpa.gg](http://www.odpa.gg))
- Right to withdraw consent (if we have relied on specific consent to process your Personal Data)

Further details of your rights can be requested from the Data Protection Responsible Person or viewed on <https://odpa.gg/exercising-your-rights/>.

Should you wish to exercise any of the rights listed above, please contact us using the details below.

## HOW YOU CAN ACCESS YOUR PERSONAL DATA

If you want to know what Personal Data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the e-mail or postal addresses shown below. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. Please contact us to request a Subject Access Request Form if required.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’, we may refuse to provide the requested information. Should any part of the request be frivolous, vexatious, unnecessarily repetitive or otherwise excessive, we may refuse to give the information or take any action requested in that part of the request, or in exceptional circumstances, a fee may be charged to cover our administrative costs in providing such information.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your Personal Data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### HOW YOU CONTACT US:

To contact us about anything to do with your Personal Data and data protection, including to make a subject access request, please use the following details

Absolutely Fabulous Ltd

First Floor  
Gategny Chambers  
Bosq Lane  
St. Peter Port  
Guernsey  
GY1 2LP

For the attention of the Data Protection Responsible Person

E-mail address: [info@abfabguernsey.com](mailto:info@abfabguernsey.com)

Telephone number: +44 (0)1481 714310

### CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.