

# PRIVACY POLICY



**PULI TRADING** ↑

## **INTRODUCTION**

Thank you for reading the Puli Trading LLP Privacy and Cookie Policy. It applies to the use of your Personal Information.

This Privacy and Cookie Policy explains how we are committed to protecting the Personal Information that you share with us, and how we collect, use, and share that Personal Information.

By "Personal Information," we are referring to personal data as defined in the General Data Protection Regulation (GDPR). In general, it means any information relating to you, which identifies you or allows you to be identified - your name, an ID number, location, an online identifier or factors specific to you (e.g. physical, physiology (thoughts, feelings), economic, cultural or social factors).

If you consented to receive Puli Trading LLP promotions and offers by email, SMS or other channel(s), you have a right to withdraw your consent at any time.

We rely on your response to our cookie banner and your browser settings to indicate your consent to the use of cookies and similar technologies on our sites. To withdraw your consent, please adjust your browser settings or contact us.

Please see:

- Key information below for our contact details.
- Where we rely on your consent.
- Your right to withdraw consent, and
- Cookies and similar technologies for information on how to adjust your browser settings.

Your right to object to our use of the "legitimate interests" basis for processing (and direct marketing) - We consider that our use of Personal Information, summarised below, is legitimate commercial practice and is in our legitimate interests:

- To conduct and improve our business and co-branded businesses.
- To maintain our accounts and records
- To promote and advertise our products.
- To support our clients
- To operate our sites
- To prevent and detect fraud.
- For diagnostics and IT security
- For direct marketing (where consent isn't required)
- Our disclosures (if any) of possible criminal acts or security threats to the proper authorities.

To exercise your right to object, please contact us. Our contact details can be found under the 'Key information' section below.

## **INDIVIDUALS TO WHOM THIS PRIVACY AND COOKIE POLICY APPLIES**

These are the categories of individuals whose Personal Information we collect and use:

- **Website visitor** – someone who browses our Site but does not register.

## **SITES TO WHICH THIS PRIVACY AND COOKIE POLICY APPLIES**

This Privacy and Cookie Policy applies to Personal Information collected on our Puli Trading website at pulitrading.com

## **KEY INFORMATION REQUIRED BY THE GDPR**

Here are important details about us and our use of your Personal Information.

Puli Trading LLP (company number OC445635)

We are entered in the Information Commissioner's register of data controllers with registration number 11970371.

Registered office address:

2a The Quadrant, Epsom, Surrey,  
England. KT17 4RH

Email: support@pulitrading.com

If you have any questions, have a complaint, or wish to send us comments about this Privacy and Cookie Policy, e-mail, or write to our data protection officer. We will investigate your complaint and use reasonable efforts to respond to you as soon as possible.

Please use the email details in the "Key Information" section above to contact our data protection officer.

The purposes for which we use Personal Information are:

- To conduct our business
- To maintain our accounts and records and keep our records up to date.
- To promote and advertise our service.
- To support and manage our Clients and Agents
- With consent, for direct marketing
- With consent, to provide events and other communications to Clients and Affiliates.
- With consent, for analysis by aggregating Personal Information (for example to provide rankings/tabulated statistics and event itinerary forms)
- To operate our Sites
- To help detect and prevent fraud.
- For diagnostics and IT security
- Our disclosures (if any) of possible criminal acts or security threats to the proper authorities.

Our legitimate interests are to operate our business in accordance with legitimate commercial practice, for example to provide services, to maintain accounts and records, and for promotion and advertising, including management of our Client accounts, fraud prevention, direct marketing (where consent isn't required), internal group administration and administration of other relationships, network and information security and reporting criminal and security threats.

The period for which we will store Personal Information is based on our need to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements.

For website visitors, if you consent to cookies through our cookie banner, the consent cookie is valid for 1 year. If you agree to our terms and conditions when logging in as a member, we will store that cookie and it is valid until the document is updated and changed. The vast majority of cookies (most of which are for site analytics) last two years or less. You can shorten each cookie's storage period by deleting the cookie before the expiry date. Please see part 8 Cookies and similar technologies for information on how to delete cookies and adjust your browser settings.

You have rights to make a request to us:

- For access to your Personal Information
- For erasure of your Personal Information
- For restriction of processing concerning you
- To object to our processing which is based on legitimate interests
- To object to direct marketing (including to object to related profiling)

If you are a member, you can access some information yourself. Please see below.

To exercise your rights, please contact us. Our contact details are in the 'Key Information' section above. We can send you an individual rights form if you wish, but the law does not require you to complete a form.

You have a right to withdraw any consent you give us at any time.

This will not affect the legality of our consent-based use before you withdrew consent. You have a right to complain to the Information Commissioner, whose contact details are Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

England

Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate).

Website: <https://ico.org.uk> which sets out email addresses and an email form.

We do not use automated decision-making which produces legal effects or similarly significant effects. We do however conduct data analytics on purchases to understand how we can improve our business model. We also use web analytics on our Sites which affects website visitors.

We do not base profiling on special categories of Personal Information, that is Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a

V1. 29.06.23

natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Significance and envisaged consequences for you: as a result of data analytics, you may see different recommendations depending on your purchases and browsing or a new feature on the Site; data analytics also helps keep you and other Affiliates and Customers safe from fraudulent activity.

**Additional details on Personal Information collected (directly or indirectly):**

- The Internet protocol (IP) address used to connect your computer/mobile device to the Internet.
- Login, e-mail address, password (if you are enrolled/registered)
- Computer and connection information such as
  - browser type and version
  - time zone setting
  - browser plug-in types and versions
  - operating system
  - the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time)
  - cookie number
  - products you viewed or searched for
  - any phone number used to call our customer service number.
- Browser data such as
  - cookies (please see part 8)
  - Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our Site to support fraud prevention and other purposes, such as to gauge viewing patterns of videos on our Sites.
- Session information collected via software tools such as JavaScript including.
  - page response times
  - page response times
  - download errors.
  - length of visits to certain pages
  - page interaction information (such as scrolling, clicks, and mouse-overs), and
  - methods used to browse away from the page.
- Technical information to help us identify your device for fraud prevention and diagnostic purposes.

**Sensitive (special categories of) Personal Information**

None

**Personal Information collected about online visitors.**

- Information you provide.

We generally collect only Personal Information you voluntarily provide to us, or which is collected through cookies or similar technologies. For some secure areas of our Site, however, we require you to provide Personal Information when you use specific features. For example, we collect Personal Information from you when you:

- Ask to register for an account with us.
- Participate in promotions or surveys.
- Submit comments, reviews, or other user-generated content.
- Connect or interact with us through social networks (e.g., Facebook, Google+, Twitter), and
- Request customer or technical support.

This Personal Information, for example, may include your:

- Name
- Postal or billing address
- E-mail address
- Telephone or mobile number
- Payment card information
- Location via IP address

If you can't or choose not to provide us with the Personal Information we reasonably require, we may be unable to provide you with the information you have requested.

### **Information collected through technology.**

Information is also collected through technology. Some of this information may be linked to you personally. This information helps our Sites function correctly and supports the work we do to understand the needs of our members.

### **Do we advertise online?**

We advertise in a number of ways, including online through managed social media presences, and mobile applications. To understand how our advertising campaigns are performing, we may collect certain information via our Sites through our advertising service providers. We or our suppliers use several common online tracking tools to collect this information, such as browser cookies, web beacons and other, similar technologies. The information we collect includes IP addresses, the number of page visits, pages viewed via our Sites, search engine referrals, browsing activities over time and across other websites following your visit to one of our Sites or applications, and responses to advertisements and promotions on the websites and applications where we advertise.

We also use certain information to:

- Present tailored ads, including banner ads and splash ads that appear as you log-in or off of your online accounts via our Sites.
- Identify new visitors to our Sites.
- Recognise returning visitors.

- Advertise on other websites and mobile applications not affiliated with us.
- Analyse the effectiveness of our advertisements.
- Better understand our audience, customers, or other Site visitors, and
- Determine whether you might be interested in new products or services.

**Controlling our tracking tools.** Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Sites. If you block or delete cookies, not all of the tracking that we have described in this section will stop and our Site may stop working in part or completely. Some browsers have a “**Do Not Track**” feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

For more information about our ad service provider and its cookies, including information about how to withdraw your consent to these technologies, you may visit [www.aboutads.info/choices](http://www.aboutads.info/choices). In addition, users may prevent Google’s collection of data generated by your use of the Sites (including your IP address) by downloading and installing a Browser Plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>. Please also see part 8 (cookies) for further information.

#### **How Personal Information is used and shared.**

Personal Information is used to:

- Respond to your questions, complaints, or reviews of our services.
- Administer contests, promotions, or surveys.
- Send you communications about promotions, electronic newsletters, or other notices or offers tailored to you.
- Comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities.
- Help us run our business.
- For any other everyday business purposes.

**Sale of the businesses.** If we sell all or part of our business, Personal Information may be transferred to the buyer in connection with that transaction. We will use reasonable efforts to include contractual provisions that require the buyer to treat your Personal Information as set out in this Privacy and Cookie Policy.

**Other disclosures.** We may otherwise disclose Personal Information as permitted or required by law, when we believe in good faith it is necessary for safety purposes, required for legal reporting, or to protect our legal rights or enforce our Terms of Use or any applicable rules, or to protect the rights of others. We may also disclose Personal Information to our auditors, legal advisers, or to respond to a court order. We may also aggregate information that we gather about you (e.g., online sales, traffic patterns) and provide these statistics to others in aggregate form.

## Choices you have about the collection, use, and sharing of your Personal Information

If you signed up to receive marketing communications from us, you can opt-out any time by clicking the unsubscribe link at the bottom of the message or texting STOP in response to a marketing text message. You can also log-in to your account to opt-out and update your marketing preferences at any time, or just contact us to let us know. Even after you opt-out or update your marketing preferences, please allow us sufficient time to process your marketing preferences. It may take up to 10 days to process your e-mail related requests, and up to 30 days for all other marketing-related requests. And even after you've opted-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, surveys or recalls, or any questions regarding a specific order.

## How can you access, update, or block your Personal Information?

You can change Personal Information, you provided to us by logging-in your account, and making the appropriate changes or corrections yourself, or contact us directly at the address below. If you wish to deactivate your account, you may do so by contacting our Members support team at [support@pulitrading.com](mailto:support@pulitrading.com) Once you do so, your account will be de-activated on a going-forward basis, although certain Personal Information may still be retained to the extent necessary to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements.

## Cookies and similar technologies

A cookie is a file containing a small amount of information that a Site places on your device. We use cookies and similar technologies to help us understand how people interact with our Sites. That means we can make improvements and develop the Sites in an informed way for our website visitors and Members

Similar technologies include:

- Local shared objects (Flash cookies) – data that websites which use Adobe Flash store on your device.
- Local storage (session storage and database storage) – a type of file placed on your device that can hold data, often related to video or audio content.
- Pixels – (also known as clear gifs, web beacons or web bugs) are code used on a web page or in an email notification. They are used to learn whether you've interacted with certain web or email content. This helps to measure and improve services and personalise your experience.

## What cookies do we use?

**Strictly necessary cookies.** These cookies are generally used to store a unique identifier to manage and identify you as unique to other users currently viewing the Site, in order to provide you with a consistent and accurate service.

**Performance cookies.** These cookies are used for performance and to improve the Site.

**Functionality cookies.** These cookies will typically be the result of something you do but might also be implemented in the delivery of a service not explicitly requested but offered to you. They can also be used to prevent you being offered a service again that had previously been offered to you and rejected.

**Targeting or advertising cookies.** These cookies contain a unique key that is able to distinguish individual



users' browsing habits or store a code that can be translated into a set of browsing habits or preferences using information stored elsewhere. Cookies may also be used to limit the number times a user sees a particular ad on a Site and to measure the effectiveness of a particular campaign.**How to see individual cookies and withdraw your consent to the use of cookies and similar technologies.**

Cookies change and their names and descriptions are not very user-friendly for most people, so we haven't listed them individually. If you want to see the cookies currently used on the Sites, they should be visible through your browser. (Please see below for instructions.)

To give or withdraw your consent to the use of cookies, please use the cookie banner on the Site and after that, please adjust your browser settings.

There are different browsers and manufacturers upgrade them frequently. The best way to get the right instructions is to go to the manufacturer's support page.

If you have problems with these pages, can't see individual cookies or want to find out more about how cookies are handled within your browser, please go to the manufacturer's site and search for the browser name and your cookie query.

## **UPDATES**

We may change this Privacy and Cookie Policy at any time. If we make any material change in how we collect, use, share, or otherwise process Personal Information, we will prominently post an updated Privacy and Cookie Policy on our Sites. Any material changes to this Privacy and Cookie Policy will be effective ten days (10) after our posting of the updated Privacy and Cookie Policy. Where required to do so by law, we may seek your prior consent to any material changes we make to this Privacy and Cookie Policy. If you disagree with our Privacy and Cookie Policy changes, you may de-activate your account.