

Mi Hub Limited Privacy Notice



This notice describes how we collect, store, use and share your personal information. It also explains the rights you have in relation to the personal information that we hold about you and it applies to personal information provided to us, both by you or by others on your behalf.

Who We Are

When we say 'we' or 'us' in this notice we are referring to Mi Hub Limited (England & Wales registration number: 00454264) and this may refer to our brand names or subsidiary companies. When we use "you" or "your", we refer to you as an individual. This policy covers the following (collectively called Mi Hub):

Name & Brand	Address/Contact Information	Registration Number
Mi Hub Limited (for all UK locations): <ul style="list-style-type: none">• Dimensions• Alexandra• Yaffy	Data Privacy Office 3 Long Acres, Willows Farm, Castle Donington, Derbyshire, DE74 2UG 01332 697227 dpo@mi-hub.com	00454264
Alexandra IRL Limited	12a Balloo Avenue, Bangor, Northern Ireland, BT19 7QT 01332 697227 dpo@mi-hub.com	NI607956
Alexandra Corporate Fashion BV	Sterrekroos 7 4941 VZ Raamsdonksveer Nederland 01332 697227 dpo@mi-hub.com	50728474

You can also use the above information to contact us, with any aspects of your data protection legal rights under EU GDPR or the UK DPA 2018/UK GDPR.

Mi Hub uses multiple brands across our own websites,



Our USA brands (Twinhill and Affinity) are out of scope of this privacy notice. As they are predominantly operating for customers in the USA, they will have their own privacy notice.

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What Information We Collect

In our business activities, like all businesses, we collect personal information from you. It is possible that you may have multiple types of interactions with us. Mostly this is used to execute orders for products you buy, and sometimes used to market products that may be applicable to you.

Who we collect from	What personal data we collect
Prospective employment candidates.	Applicant details as included within a curriculum vitae (CV), including name, contact number and email, previous employment history.
Employees	Name, address, next of kin, nationality, age, gender, previous employment details, curriculum vitae (CV), drivers license, passport, employment references, pensions beneficiaries, tax code and national insurance details, health or disability conditions, bank account or other relevant financial details.
Individual Customers or prospective customers (also Corporate Buyers on behalf of companies)	Login information, names, shipping address, product sizing or modifications to products, delivery contact name if different, payment (credit card for example) details etc., telephone call recording for customer services or complaint procedures, online "Live Chat" messages, catalogue requests,
Website Visitors	Technical information, for example cookies, browser type, and IP address (your computer's internet address), if you use our websites. If you order a product, you also become an Individual Customer. Catalogue or other marketing information requests & newsletter requests.
Corporate Customer employees (wearers)	Only if your personal data is provided to us by your employer, do we use that data for sizing, shipping, or order confirmations.

Where We Store Your Personal Data

We have several UK locations (including Northern Ireland) and an office in the Netherlands (EU). Access to data is available from any of our office locations as needed for staff to perform their duties.

These staff may need to execute activities such as, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this data processing to execute these tasks. We will take reasonable steps to secure and protect your data in accordance with this privacy policy.

As a normal part of data security, we also use Microsoft's cloud services, based in the UK, to hold copies of all our data. This helps us provide a more reliable service to you and provides a safe backup of all our business data.

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How We Use Your Information

Depending on your role (visitor, customer, wearer etc.) we will collect and use the data differently, these are summarised below:

Category	Lawful Purpose
Account creation, order processing, invoicing/billing, contract obligations from your employer, order information status & updates, customer service.	Execution or performance of a contract
Promotion of Goods similar/connected to your browsing or orders.	Legitimate interest.
Technical information to ensure that the websites perform as needed and technical issues are resolved.	Legitimate interest.
Provision of marketing information (catalogues, newsletters, promotions etc.)	Opt-in consent.
Anonymised data. Using general and statistical data to identify trends or market research.	Legitimate interest.
Regulator requests, government requests etc.	Legal or Regulatory requirement.

Marketing Preferences

If you choose to opt-in to receive marketing information, we will provide you with information about goods or services we feel may interest you. If your preferences change, you can request that we stop sending you marketing information. Your marketing webpage also allows you to change your preferences. This process usually takes 48 hours to complete as the preferences are used in multiple systems.

Telephone Call Recording policy

We have a telephone system that is capable of recording conversations. This is a standard industry practice that allows the recording of telephone calls for the fulfilment of our contractual obligations, for quality monitoring, training, compliance, and security purposes. Inbound and Outbound calls for the following departments (such as Customer Services, Sales and Credit Control) may be recorded and retained in accordance with pre-defined retention periods. These recordings will only be used for the purposes specified in our Telephone Call Recording policy which is available at our web site or upon request. If calls are transferred from Sales, Customer Services or Credit Control to a member of staff outside of these departments, the call recording will cease once the call is successfully transferred.

Credit References

In cases where credit is offered, in order to process your application we will then supply your personal information to credit reference agencies and they will give us information about you, such as your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with those agencies on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>

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CRAIN (Credit Reference Agency Information Notice) is a document produced by the three Credit Reference Agencies- Experian, Equifax and TransUnion that explains the use of personal data they receive from third parties about individuals and/or their businesses in relation to credit activity. CRAIN has been produced in conjunction with the UK Information Commissioner's Office (ICO).

Security

We take on-line data security very seriously. We know how much data security matters to all our customers, employees and visitors. We will take all appropriate steps to protect it. We do this in the following ways:

Employee access to data

To protect your data we have employed specific individuals, who oversee compliance with legislation and specialist individuals for our technical infrastructure, applications, data stores and access controls.

Those employees that do have access to your personal information are restricted by their specific roles and general access to all data is not permitted.

Browser & Web Server

We use Transport Layer Security (TLS) to encrypt data transmissions between your browser and our web server, to ensure that all personal and transactional information is protected from eavesdropping, tampering or alteration.

Payments, PCI/DSS

Also, protection and security of the payment system itself is important. We safely process your card payment(s) through your bank and complete the transaction(s) securely behind protected firewalls and encrypted connections between the bank and us. PCI / DSS is the worldwide payment card industry data security standard that was set up to help businesses process card payment securely and reduce card fraud. We are PCI / DSS compliant.

Technology

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security. We also use hard disk encryption, firewalls, password protections, anti-virus and access checks for our employees. The security measures described above ensure that all reasonable steps are taken to protect your personal information. However, the nature of the Internet means that an absolute guarantee of security cannot be offered, and you should be aware that there may be a small security risk in exceptional circumstances when disclosing information online.

ISO 27001

We take additional steps and are officially certified and approved against the global standard ISO 27001:2013. This is a world class official ISO standard to protect technology systems, data and the management of those environments.

This ensures we have a robust set of policies, processes and procedures to prevent data problems and to maintain our level of protection for your personal data. It also provides us a controlled mechanism by which to examine future ways of improving the protection of your personal data and how we handle it.

Document Ref: DPO-03 – Mi Hub Limited Group Privacy Notice / Issue: 1 / Date: 31st December 2020

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Do We Sell Your Information To Third Parties?

Other divisions/brand/entities within our group

We do allow transfers of personal data within the group in the normal business process, such as filling an order, performing a credit check if needed, processing payment details, or servicing a customer request.

We also transfer personal data to our vendors, if they are required to perform activities such as personalisation of products, or direct shipping from our supplier to yourself. The circumstances under which this is allowed are limited.

External Organisations

In some circumstances, it may be necessary to cooperate with authorities in relevant countries in the case of fraud, regulatory or legal actions. We abide by those actions based on our legal review.

If you have provided consent to marketing information, you may also receive marketing information from external companies related to the products or services you are interested in.

We sometimes share personal data with trusted partners that provide optional services. An example of this is product and service surveys that are important to us to gather customer feedback. You are not obligated to enter any information, as they are optional.

Under no circumstances do we permit the selling of your personal data to other organisations.

International Data Transfers

In cases where we transfer data as part of our normal business activities we will have the appropriate contractual safeguards in place, including those with our suppliers.

How Long Do We Keep Your Data?

In order to provide a high-quality of service, it is necessary that we keep some data to continue to service your customer needs. As such, the following retention periods apply:

Types of data	Purpose(s)	Retention Period
Prospective Customer/Recruitment Candidate Data	For potential employment within the Mi Hub companies.	<ul style="list-style-type: none">13 months, live 12 months, 1 month in archive.
Employee data	Employment. Legal Obligation	<ul style="list-style-type: none">7 years after the employee leaves us.
Customer data	Execution or performance of a contract (corporate).	<ul style="list-style-type: none">Either 10 years after the last transaction takes place, orIndefinitely if any illegal or fraud activity is detected, or it is additionally required for legal or regulatory purposes.

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Telephone Recordings	To monitor customer service performance, to prevent fraud etc.	<ul style="list-style-type: none">13 months in total. 12 months accessible, 1 month in an archive.
Accounts and legal data.	Execution or performance of a contract (corporate).	As required by UK laws. Normally 7 years.

Your Rights

When We Act as a Data Controller or as a Data Processor

If you are an employee and we have a contract with your employer, we may only be a processor of your personal data. In these cases, we forward any requests to your employer.

When we sell products through a reseller or online marketplace, again we may only be a data processor and the seller will be the actual data controller. They will respond with respect to your data rights. Any requests made through us will be forwarded to the relevant data controller and they will manage all communications with you.

If the purchase is directly through us (phone, post, website) then we are the data controller and we will respond to your request.

Under EU GDPR and UK DPA 2018 (UK GDPR), you have certain data protection rights.

Right to Information/Notification

This right provides you to ask us for information about what personal data we hold about you, how it is being processed and the reasons for that processing.

Where you have bought a product or service from any of our resellers, or on their online stores, they will have your customer details, so any notifications or access to data will be managed by them.

If we ever experience a data leak that could have significant negative consequences for your personal privacy rights and freedoms, then you as a customer will be personally informed of the circumstances and actions we are currently taking and will take in the future.

Right to access

This right provides you with the ability to get access to your personal data that is being processed. You can request to see or view your own personal data, as well as to request copies of the personal data if you do not already have a copy, or you do not know it. You may also use a third party to make the request, and we will ask for authorisation proof (power of attorney etc.) if needed.

Right to rectification

This right provides you with the ability to ask for modifications to your personal data in case you believe that the personal data is inaccurate. We are happy to do this via our customer services team or via the Data Privacy Office contact information.

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Right to withdraw consent

This right provides you with the ability to withdraw a previously given consent for processing of your personal data. The request requires us to stop the processing of that data for that specific purpose in the future. Mainly, for us, this applies to marketing activities and if you ask us to stop sending you particular or all product or services information, we will do so.

Right of Erasure/Right to be forgotten

This right allows you the ability to ask for the deletion of your data. This will generally apply to situations where we no longer have a customer relationship with you and the data has not been deleted already. In some cases, we have a legal obligation to keep certain data (invoices, financial records etc.) and therefore this right is not an absolute right.

Right to object

This right provides you with the ability to object to the processing of your personal data. For example; you can also ask for your data not to be processed for scientific or historical research purposes (if relevant) unless it is necessary for public interest reasons. However, this is also not an absolute right, as we may have legal, regulatory, contractual, or legitimate interest processing reasons to consider also.

Right to object to automated processing/automated decision

You can also object to a decision that is made automatically, and to have that decision reviewed by a person. This is usually used for credit agreements if you believe that the decision does not account for unique personal circumstances.

Right to Data Portability

If you have consented or contracted to provide us personal information and our processing is automated, then you can ask for that data to be made portable. However, at present there is no standard on which this portability occurs to allow easy transfer and we do not have partners that would use that data in this way.

Escalation to Your Supervisory Authority

In the event that you are unhappy with our processing of your personal data, you also have the right to lodge a complaint, at any time, with the relevant supervisory authority in the country where you live, or as below:

UK:	Information Commissioner's Office (ICO)	https://ico.org.uk/concerns/
NL:	Autoriteit Persoonsgegevens	https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us

If you live outside the Netherlands or the United Kingdom, your complaint will remain on file within your country, but will be addressed by one of the data authorities listed above.

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Changes to this Privacy Notice

Any changes we may make to our Privacy Notice in the future will be posted on this webpage and, where appropriate, notified to you. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of our Website.