

Privacy Statement bloomon UK Limited

Latest update: January 2023

This Privacy Statement applies to all bloomon websites, applications, services and tools (collectively "Services"), regardless of how you access or use them, including via mobile devices.

We may change this Privacy Statement at any time by posting the changed version, including the effective date, here. If you are a registered customer, we will notify you by email of any material changes to this Privacy Statement.

1. Who we are

bloomon UK Limited, Covent Garden, 71-75, Shelton Street, London, WC2H 9JQ, with which you enter into contracts, is responsible for the collection, use, disclosure, storage and protection of your personal data in accordance with applicable data protection laws together with bloomon SSC BV, Helmholtzstraat 61E, 1098 LE Amsterdam (collectively "bloomon"). bloomon as the data controller is meant whenever this Privacy Statement refers to "we" or "us/our".

Our Privacy Officer can be reached at privacy@bloomon.com.

2. Personal data we collect

We collect personal data from you and any devices (including mobile devices) you use when you use our Services, register for an account with us, update or add information to your account, or when you otherwise correspond with us. We may also collect personal data about you from other sources, as described below.

Personal data you give us when you use our Services or interact with us

- Identifying information such as your name, addresses, telephone numbers or email addresses when you register for an account with us.
- The recipient's name and address (if you are not the recipient).
- Demographic information such as postcode, preferences and interests.
- Other content that you generate, or that is connected to your account (such as order history, status (active, paused, stopped), referrals, ratings/reviews or acquisition channel).
- Financial information (such as credit card or bank account numbers) in connection with a transaction.
- Shipping information, such as name and address, delivery information.

- In some instances, when you use our Services, you may provide age, gender, interests, a personal message for gift cards, and favourites.
- You may provide us other information through a web form, by updating or adding information to your account, chats, dispute resolution or when you otherwise communicate with us regarding our Services.
- You may also participate in surveys for research purposes and provide additional information via questionnaires.

Personal data we collect automatically when you use our Services or interact with us

- We collect information about your interaction with our Services and your communications with us. This is information we receive from devices (including mobile devices) you use when you access our Services.
- Computer and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information.
- Facebook user id if you created an account with Bloom & Wild using Facebook.

Personal data we collect using cookies and similar technologies

- We use cookies, web beacons, unique identifiers and similar technologies to collect information about the pages you view, the links you click and other actions you take when using our Services, within our advertising or email content.
- For more information about our use of these technologies, and how to manage them, see our Cookie Statement.

Personal data collected from other sources

- We supplement the personal data we collect from you with information collected from third parties and add it to your account information. For example, we collect and use demographic and other information that is publicly available.

3. How we use your personal data

We use the personal data we collect about you for a range of different business purposes and according to different legal bases. The following is a summary of how and according to which legal bases we use your personal data.

We use your personal data to enter into and fulfil a contract with you. This includes:

- The delivery of the flowers and/or vases ordered by you. In order to ensure the smooth delivery and delivery of your order, we pass on your personal data, such as your address and telephone number, to the transport service providers cooperating with us.

- To provide payment processing and account management, operate, measure and improve our Services and to keep our Services safe, secure and operational.
- To contact you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed or as otherwise necessary to provide you customer service.
 - When contacting you for such purposes as outlined above, we may contact you via email and SMS/text messages.
 - When contacting you via telephone, to ensure efficiency, we may use autodialed or pre-recorded calls and text messages as described in our Terms and Conditions. Message and data rates may apply.
- To provide other services requested by you as described when we collect the information.
- To enforce our Terms and Conditions or other policies.

We use your personal data to comply with our legal obligations. This includes:

- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.
- Participation in investigations and proceedings (including judicial proceedings) conducted by public authorities or government agencies, in particular, for the purpose of detecting, investigating and prosecuting illegal acts.
- Ensuring the information security of our Services.
- Retention and storage of your personal data to comply with specific legal retention requirements.

We use your personal data to pursue our legitimate interests where your rights and freedoms do not outweigh these interests. We have implemented controls to balance our interests with your rights. This includes:

- To improve our Services, for example by reviewing information associated with stalled or crashed pages experienced by users allowing us to identify and fix problems and give you a better experience.
- To determine in which of our products or services you would be interested.
- To customise the website or app according to your interests.
- To personalise, measure and improve our advertising based on your advertising customisation preferences where we do not obtain your consent.
- We use general location information to provide you with location-based services (such as advertising, search results and other personalised content) where we do not obtain your consent.
- To use certain limited personal data about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook, to generate leads, drive traffic to our websites or otherwise promote our products and services. These processing activities are based

on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. The social media platforms with which we may share your personal data are not controlled or supervised by bloomon. Therefore, any questions regarding how your social media platform service provider processes your personal data should be directed to such provider. Please note that you may, at any time ask bloomon to cease processing your data for these direct marketing purposes by sending an e-mail to privacy@bloomon.com.

- To contact you via email, SMS or WhatsApp/FB Messenger in order to offer you discounts and special promotions, and inform you about our Services where we do not obtain your consent.
- To deliver targeted marketing, service updates and promotional offers based on your communication preferences where we do not obtain your consent.
- To measure the performance of our email marketing campaigns (e.g. by analysing open and click rates).
- To detect and prevent fraud to the extent that there is not already a legal obligation for us to do so.
- To monitor and improve the information security of our site and mobile applications to the extent that there is not already a legal obligation for us to do so.
- To offer you discounts on our services based on an algorithmic model we have developed and to continually improve this model. Data we process for this purpose inter alia include how often you purchase from us, how recently you purchased, the discount level received and how recently you used a discount code.
- To ship an order to you that someone else has purchased on your behalf or as a gift for you.

With your consent, we may use your personal data to:

- Provide you with marketing via email, SMS/text message and telephone.
- Provide you with marketing from other Bloom and Wild corporate family members.
- Provide you with marketing from third parties.
- Show you personalised third-party advertising on our Services.
- Show you personalised advertising on third-party websites.
- Poll your opinions through surveys or questionnaires
- Have our shipping providers deliver your shipment to a third party (e.g., your neighbour) or as otherwise instructed by you

You have the right to withdraw your consent at any time (see 'Your rights' below).

4. Your choices about how we use your personal data

Marketing

You can control your marketing communication preferences via the link 'Your preferences' in your account (logged-in users) or by contacting us (see 'Contact Us' below) or via privacy@bloomon.com.

If you no longer wish to receive marketing communications from us, you can also unsubscribe via the link in an email you received and indicate your communication preferences using the method described within the direct communication from us. Keep in mind, we do not sell, rent or otherwise disclose your personal data to third parties for their marketing purposes without your consent.

Advertising

If you do not wish to participate in our advertising personalisation programs, you can decline or withdraw your previous consent via the link "Cookie preferences" in the footer of each page. The effect of declining or withdrawing your previous consent will be to stop personalised advertising, but it will still allow the collection of personal data as otherwise described in this privacy notice.

Staying Signed in

When you sign into your account on our Services, we give you the option to stay signed into your account for a certain amount of time. If you are using a public or shared computer, we encourage you not to choose to stay signed in. You or any other user of the computer/browser you signed in on will be able to view and access most parts of your account and take certain specific actions during this signed in period without any further authorisation. The specific actions and account activities that you or any other user of this computer/browser may take include:

- Viewing the information in your bloomon account
- Placing orders
- Cancelling orders

If you attempt to change your password, you may be required to enter your password.

You can typically end your signed in session by either signing out and/or clearing your cookies. If you have certain browser privacy settings enabled, simply closing your browser may also end your signed in session. If you are using a public or shared computer, you should sign out and/or clear your cookies when you are done using our Services to protect your account and your personal data.

5. Your Rights

You may exercise any of the rights described in this section by sending an email to privacy@bloomon.com. Please note that we may ask you to verify your identity before taking further action on your request.

Managing Your Information

You may access and update some of your information through your bloomon Account. You are responsible for keeping the personal data in your account up-to-date.

Right of access

You can obtain information from us about which personal data we process in which manner and for which purposes.

Rectification of Inaccurate or Incomplete Information

You have the right to ask us to correct inaccurate or incomplete personal data concerning you (and which you cannot update yourself within your bloomon Account).

Data Access and Portability

You have the right to request a copy of your personal data held by us. You may also be entitled to request copies of the personal data that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

Data Retention and Erasure

We generally retain your personal data for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal data and close your bloomon Account. Please note that if you request the erasure of your personal data:

- We may retain some of your personal data as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- We may retain and use your personal data to the extent necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting and auditing obligations.
- Because we maintain the bloomon Platform to protect from accidental or malicious loss and destruction, residual copies of your personal data may not be removed from our backup systems for a limited period of time.

Withdrawing Consent

Where you have provided your consent to the processing of your personal data by bloomon you may withdraw your consent at any time by contacting us or by sending a communication to privacy@bloomon.com specifying which consent you are withdrawing. Alternatively, you may withdraw your consent to receive marketing messages in your account ('Your preferences') and your consent to personalised advertising via the link "Cookie preferences" in the footer of each page.

Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

Restriction of Processing

You have the right to request us to limit the ways in which we use your personal data.

Objection to Processing

You have the right to request us not to process your personal data for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal data for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims.

Where your personal data is processed for direct marketing purposes, you may, at any time ask bloomon to cease processing your data for these direct marketing purposes by sending an e-mail to privacy@bloomon.com.

Lodging Complaints

You have the right to lodge complaints about the data processing activities carried out by bloomon before a data protection supervisory authority of your choice, e.g. the Information Commissioners' Office ("ICO"). In the UK, please read: <https://ico.org.uk/for-the-public/raising-concerns/> for details of how to do this. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

6. How we might share your personal data

We may disclose your personal data to the following parties for the following purposes:

Bloom and Wild corporate family members (the owner of the bloomon group and Bergamotte group), based on our legitimate interest in transmitting personal

data within our corporate family for internal administrative purposes and to leverage our group activities, who may use it to:

- Provide joint content and services (like registration, transactions and customer support) or restructure our corporate family members' respective activities
- Help detect, investigate, mitigate and prevent potentially fraudulent and illegal acts, violations of our Terms and Conditions and data security breaches
- Provide you personalised advertising or marketing
- Improve their products, sites, applications, services, tools and marketing communications.
- Members of our Bloom and Wild corporate family will use your personal data to send you marketing communications only if you have consented to receive such communications from them or if otherwise permitted by the law.

Service Providers and financial institutions partners as follows:

- Third-party service providers who help us to provide our Services, payment processing services, assist us in providing customised advertising or marketing, assist us with the prevention, detection, mitigation, and investigation of potentially illegal acts, violations of our Terms and Conditions, fraud and/or security breaches, bill collection, and other business operations, in order to fulfil our contract with you, based on our legitimate interest in the abovementioned purposes or based on an agreement pursuant to Art. 28 GDPR, as applicable.
- Third party transport providers (e.g., DHL, PostNL, etc.) with whom we share your personal data for the purposes of facilitating the delivery of items purchased and other delivery related communications, in order to fulfil our contract with you.
- Based on our legitimate interests to do market research, we may share customer name, address and purchase information with Epsilon Abacus so they can analyse what products may interest you and contact you accordingly via post. We work with Epsilon Abacus (registered as Epsilon International UK Ltd), a company that manages the Abacus Alliance on behalf of UK retailers. The participating retailers are active in the clothing, collectables, food & wine, gardening, gadgets & entertainment, health & beauty, household goods, and home interiors categories. This group of retailers share information on what their customers buy. Epsilon Abacus analyses this pooled information to help the retailers understand consumers' wider buying patterns. From this information, retailers can tailor their communications, sending people suitable offers that should be of interest to them, based on what they like to buy.

Law enforcement authorities, participants in legal proceedings and as authorised by law:

- To comply with our legal obligations or to pursue our legitimate interest in enforcing our Terms and Conditions or protecting our and third parties' rights, property or safety as applicable.
- To third parties involved in a legal proceeding, if they provide us with a subpoena, court order or substantially similar legal basis, or we otherwise believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity, based on our legal obligation or our legitimate interest in pursuing the abovementioned goals.

Change of Ownership:

If we are subject to a merger or acquisition with/by another company or acquire another company, we may share information with them in accordance with applicable law based on our legitimate interest in growing and restructuring our business. Should such an event occur, we will require that the new combined entity follow this privacy notice with respect to your personal data. If we intend to handle your personal data for any purposes not covered in this Privacy Statement, you will receive notification of the processing of your personal data for the new purposes in due time.

Other:

- Where you have consented to such, our competition and brand partners.
- Our customer service platform providers so you can interact with our customer service team, for the purpose of the performance of a contract with you and/or our legitimate interests.

7. How long we store your personal data

Our specific retention periods for personal data are documented in our retention schedule. How long we retain personal data can vary significantly based on context of the Services we provide and on our legal obligations. The following factors typically influence retention periods:

- How long is the personal data needed to provide our Services? This is the general rule that establishes the baseline for most of our data retention periods.
- Is the personal data sensitive? If so, a shortened retention time is generally appropriate.
- Have you provided consent for a longer retention period? If so, we will retain data in accordance with your consent.
- Are we subject to a statutory, contractual, or similar obligation to retain your personal data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or personal data retained for the purposes of litigation.

When it is no longer necessary for us to retain your personal data, we will dispose of it in a secure manner according to our data retention and deletion policies.

8. Operating globally

To facilitate our operations we may transfer, store, and process your information within our family of companies or with service providers based outside the United Kingdom (UK). Laws in countries outside the UK may differ from the laws applicable in the UK. Where we transfer store and/or process your personal data outside of the European Economic Area we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection, by relying on adequacy decisions or Standard Contractual Clauses (SCC). For more information regarding the safeguards we have implemented, please contact us.

9. Security

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your data against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your bloomon Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your bloomon Account, please contact us following the instructions in the 'Contact Us' section below.

10. Other important information

Children's Privacy

Our websites are general audience websites and not intended for children. The same is true for our app. We do not knowingly collect personal data from users deemed to be children under their respective national laws.

Other people's personal data

If you give us personal data about someone else, you must do so only with that person's consent. You should inform them how we collect, use, disclose, and retain their personal data according to our privacy notice.

Please note that we may disclose your identity at the request of a recipient. If possible and to the extent necessary, you will be informed thereof in advance and will be given the opportunity to disclose your identity to the recipient yourself, or to object to the disclosure of your identity, so that we can take your specific objections into consideration before disclosing your identity to the recipient ourselves.

Automated decision-making

We may use technologies considered automated decision-making or profiling. We will not make automated decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are required by law to use such technology. In case we do so, we will provide you with information about the logic involved as well as the significance and the envisaged consequences.

11. Contact Us

If you're looking for more help or have a question, contact us at privacy@bloomon.com