



PRIVACY POLICY

LAST UPDATED: DECEMBER 19, 2019

This "Privacy Policy" describes the privacy practices of LOOP Durable System UK Limited (together with our affiliates, "**LOOP**", "**Company**" "**we**", or "**us**"). LOOP offers a full service distribution solution, including proprietary online services, the website located at: www.loopstore.co.uk (the "**Site**"), software and applications (collectively, the "**LOOP Platform**"), that facilitates the sale, purchase, and delivery of consumer product goods ("**Goods**") that are packaged in durable and refillable packaging and the return and processing of the durable and refillable packaging, once used, for re-use with additional purchases of the same Goods, which includes the tracking required to ensure the quality assurance of such cleaned and refilled packaging (together with the LOOP Platform, the "**Services**"). This Privacy Policy describes how we collect, use, disclose and otherwise process personal information in connection with our Services, and explains the rights and choices available to individuals with respect to their information. This Privacy Policy governs any of the Services on which the Privacy Policy is posted.

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1. Personal Information We Collect

Information you give us

Personal information that you may provide through the Services or otherwise communicate with us includes:

- **Account information**, we collect information from you when you register for an account (“**Account**”) on the Site, such as your first name, last name, shipping address, billing address, email address, telephone and credit/debit card details
- **Profile information**, such as your password;
- **Feedback and correspondence**, such as information you provide in your responses to surveys, when you participate in market research activities, sweepstakes, contest or giveaway, report a problem with the Services, receive customer support or otherwise correspond with us;
- **Transaction information**, such as details regarding your subscriptions, such as the Goods you select, your shipments and shipping and billing details;
- **Usage information**, such as information about how you use the Services and interact with us;
- **Marketing information**, such your preferences for receiving marketing communications and details about how you engage with them;

Information we get from others. We may also get information about you from other sources, for example from Google, if you are signed into Google, we may get demographic data (e.g. gender, age), if you are not signed in, we may receive geographical and technical data (e.g. browser type, location) and we may add this to information we get from the Services.

We may combine other publicly available information, such as information related to the organization for which you work, with the personal information that you provide to us through our Services.

Information automatically collected

We may automatically log information about you and your computer or mobile device when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Sites, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Sites. We collect this information about you using cookies. Please refer to the Cookies and Similar Technologies section for more details.

Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by updating your Account or contact our customer support indicated below.

2. How We Use Your Personal Information

To provide our Services

If you have an Account or use our Services, we use your personal information to:

- operate, maintain, administer and improve the Services;
- manage and communicate with you regarding your Account, if you have one, including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages;
- process and manage subscriptions you purchase via the Services, including to track and administer your shipments;
- better understand your needs and interests, and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your service-related requests, questions and feedback.

To communicate with you

If you request information from us, register for an Account, or participate in our surveys, promotions or events, we may send you Company-related marketing communications as permitted by law. You will have the ability to opt out of such communications as described below.

For research and development

We use information automatically collected and other information to analyze trends, administer the Services, analyze users' movements around the Site, gather demographic information about our user base as a whole, improve the Services and develop new products and services.

To provide you with advertising

We may use your personal information to serve ads on the Services or on third party sites and to tailor ads to your interests and browsing history. Please refer to the Cookies and Similar Technologies section for more details.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent

We will request your consent to use your personal information where required by law, such as where we use certain cookies or similar technologies or would like to send you certain marketing messages. If we request your consent to use your personal information, you have the right to withdraw your consent any time in the manner indicated when we requested the consent or by contacting us at 020 3515 0302 or support@loopstore.co.uk .

To create anonymous data

We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by excluding information that makes the data personally identifiable to you, and use that anonymous data for our lawful business purposes.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

3. Cookies and Similar Technologies

What are cookies?

We may collect information using "cookies" or similar technologies (altogether, "Cookies"). Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of Cookies: (1) first party Cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third party Cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of Cookies for the purposes set out below:

Type of cookie	Purpose
<i>Local Storage</i>	This technology allows our Site to remember choices you make when you use our Site. The purpose of this is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Site.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information, monitor the level of activity on our Site, and improve the Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available here.</p>

Disabling Cookies

You can typically remove or reject Cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept Cookies until you change your settings.

Further information about Cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our Cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

Pixel tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike Cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively.

Do Not Track Signals

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>

4. How We Share your Personal Information

Affiliates

We may disclose your personal information to our subsidiaries and corporate affiliates for complying with the law; creating anonymous data and/or for compliance/fraud prevention and safety.

Third parties partners/organizations

In addition to the sharing described above, we may share your information with third parties partners/organizations.

If you enter into www.loopstore.co.uk we will ask for your consent to share certain personal information including for the purposes of: providing their services; communicating with you; providing you with advertising; and for research and development.

Such sharing may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by these third parties, which operate pursuant to their respective privacy policies.

Service Providers

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as customer support, hosting and storage, analytics, email delivery, marketing/advertising and database management services). These third parties may use your information only as directed by Company and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Third Party Payment Processing

For online payments, we use the payment services of Authorize.net (<https://www.authorize.net/>). We only process, record and maintain the last four (4) digits and the expiration date of your credit card so we can display it for you and may remind you before it expires. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. For more information on how payments are handled, or to understand the data security and privacy afforded such information, please refer to <https://www.authorize.net/about-us/privacy/>.

Professional advisors

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Compliance with Laws and Law Enforcement; Protection and Safety

Company may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Service; (c) protect our rights, privacy, safety or property, and/or that of you or others; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Business Transfers

Company may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

SNSs

The Services may enable you to post content to SNSs. If you choose to do this, we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the applicable website or service. We will not be responsible or liable for: (i) the availability or accuracy of such website or service; (ii) the content, products or services on or availability of such website or service; or (iii) your use of any such website or service.

5. Your Choices

Access, update, correct or delete your information

All Company Account holders may review, update, correct or delete the personal information in their Account by logging into their Account. Company Account holders may also contact us at support@loopstore.co.uk to accomplish the foregoing or if you have additional requests or questions.

Marketing communications

You may opt out of marketing-related emails by logging in and changing your account settings, by clicking on a link at the bottom of each such email, or by contacting us at support@loopstore.co.uk . You may continue to receive service-related and other non-marketing emails.

Testimonials

If you gave us consent to post ratings/comments or a testimonial on our Sites, but wish to update or delete it, please contact us at support@loopstore.co.uk.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services and may need to close your account. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

6. Security

We take a number of organisational, technical and physical measures designed to protect the Personal Information we collect, both during transmission and once received. These include but are not limited to:

- Forcing APIs (REST and Pub/Sub) to operate over encrypted ports (HTTPS and TLS).
- Data encryption between services within the cloud based systems used by Loop.
- File encryption over file servers.
- Highly restricted access to Production Environments.

However, no security safeguards are 100% secure and we cannot guarantee the security of your Personal Information. We will comply with applicable laws and regulations requiring that we notify you in the event your Personal Information is compromised as a result of a breach of our security measures.

7. Children

Our Services not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. If we learn that we have collected personal information from a child under age 16, will delete such information from our files as soon as reasonably practicable.

8. Sensitive personal data (Special category data)

We ask that you not send us, and you not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Site or otherwise to us.

If you send or disclose any sensitive personal data to us when you use the Site, you must consent to our processing and use of such sensitive personal data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such sensitive personal data to our Site.

9. Other Important Privacy Information

Third party sites and services

The Services may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

User generated content

We may make available on our Sites, or link to, features that allow you to share information online (e.g., on message boards, in chat areas, in file uploads, through events, etc.). Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly-disclosed personal information. By posting personal information online in public forums, you may receive unsolicited messages from other parties.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make changes to this Privacy Policy we will post them on the Site and update the Last Updated date above. If we make material changes to this Privacy Policy you will be notified via e-mail (if you have an Account where we have your contact information) or another manner through the Services that we believe reasonably likely to reach you. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

10. Legal basis for processing

We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at support@loopstore.co.uk.

- *Contract:*
Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.
- *Consent:*
We rely on your consent to provide you with advertising and to send out marketing communications. If we want to send you marketing communication, you will need to first provide an expressed interest in “opting in” to communications. For example when you are filling out a contact or other form, if you click on the option to Sign up for newsletters & participate in research, you are opting in to marketing communications emails. You can later opt in or out by editing your account information.

Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us.

- *Legitimate Interest:*
We rely on our Legitimate Interest to carry out the following:
 - To communicate service and support related information with you
 - To carry out analytical reports using anonymised data
 - For compliance, fraud prevention and safety
 - Records of communications sent to you or that we receive from you in relation to an event you will attend/have attended.
 - Records of events, including photography and video recordings of events
 - To send out service related communications that we believe will be of benefit to you because of a product or service that you have expressed interest in (not requiring consent). For example, we may send out an automatically generated email notifications as a reminder, where you may have not completed a purchase. Or we may send out surveys (pre or post product purchase to get your opinion on how we may best improve our products and services that you have signed up to.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Where we rely on Legitimate Interest you have the right to object.

- *Legal obligation:*
We rely on this basis when the processing is necessary for you to comply with the law (not including contractual obligations). [For example for processing financial data.](#)
- *Use for new purposes*

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

11. Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for legal or regulatory requirements, this can include but is not limited to tax and audit purposes.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

12. Cross-Border Data Transfer

Loop is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on one of the following safeguards recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

- the country to which we send the personal information may be approved by the European Commission or;
- the recipient may have signed a specific contract approved by the European Commission as providing adequate protection of personal information. For further details, see the European Commission's [website](#) for model contracts for the transfer of personal information to third countries, or;
- for transfers to third parties in the United States, ensuring they participate in the EU-US Privacy Shield Framework

13. Your rights

Right to access. You have the right to obtain from us confirmation as to whether or not personal data concerning you are processed, and, where that is the case, you have the right to request and get access to that personal data.

Right to withdraw consent. Where we have asked for your consent to process your information, you can withdraw this consent at any time by contacting us using the details below. If you wish to opt out of receiving our commercial messages, you can also do so by at any time using the "unsubscribe" link at the bottom of such e-mail. Withdrawing a consent may lead to fewer possibilities to use our Services.

Right to rectification. You have the right to obtain from us the rectification of inaccurate personal data and you have the right to provide additional personal data to complete any incomplete personal data.

Right to object. In certain cases, you have the right to object to processing of your personal data, including data relating to profiling. You have the right to object at further processing of your personal data in so far as such data have been collected for direct marketing purposes. We shall then no longer process your personal data unless we demonstrate other compelling legitimate grounds for our processing that override your interests, rights and freedoms or for legal claims.

Right to restriction of processing. You have the right to request from us restriction of processing, applicable for a certain period and/or for certain situations e.g. to allow our verification of accuracy of personal data after your contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for your legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.

Right to data portability. You have the right to receive from us in a structured format your personal data and you have the right to (let) transmit such personal data to another controller.

Right to erasure. You have the right to have personal data we process about you erased from our systems if the personal data are no longer necessary for the related purposes, if we have unlawfully processed the personal data or if you object to processing for direct marketing. Furthermore, you have the right to erasure if you withdraw consent or object to our processing as meant above, unless we have a legitimate ground to not erase the data. We may not immediately be able to erase all residual copies from our servers and backup systems after the active data have been erased. Such copies shall be erased as soon as reasonably possible.

Right to be Not Subject to Automated Individual Decision-Making. You have the right to not be subject to a decision based solely on automated processing.

Right to Filing Complaints.

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch with us, using the details below. In the event you have unresolved concerns, you also have the right to contact your local data protection authority. We hope this will not be necessary and would like to assure you we will do our best to resolve any dissatisfaction you may have. Go to www.ico.org.uk to find out more.

Contact Us

If you have any questions or concerns at all about our Privacy Policy, please feel free to contact us at support@loopstore.co.uk or write to us at:

Data Protection Officer

Loop Durable System UK Limited (TerraCycle Europe)

5 Wadsworth Road, Perivale

London, UB67JD

United-Kingdom