At Select & Save, we're working hard to support our members serve their shoppers a little better every day. Looking after the personal data you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us, and understand how we use it to offer you a better and more personalised experience.

What this policy covers

The data controller is S&S Retail Trading Ltd, (referred to in this policy as "we" or "us").

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. That's why we've developed this privacy and cookies policy ("Policy"), which:

- Sets out the types of personal data that we collect;
- Explains how and why we collect and use your personal data;
- Explains when and why we share personal data within Select & Save and with other organisations; and
- Explains the rights and choices you have when it comes to your personal data.

We offer a wide range of products and services, so we want you to be clear about what this Policy covers. This Policy applies to you if you use our services (referred to in this Policy as "our Services"). Using our Services means:

- This Policy also applies if you contact us or we contact you about our Services.

Parts of this Policy also apply to our store CCTV systems where they capture footage of you.

Our Website may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal data on a website as we do not accept any responsibility or liability for websites of other organisations.

Personal data we collect

This section tells you what personal data we may collect from you when you use our Services and what other personal data we may receive from other sources.

When you register for our Services, you may provide us with:

- Your personal details, including your postal addresses, email addresses, phone numbers and date of birth and title.

When you browse our Website we may collect:

- Information about your online browsing behaviour on our Website and information about when you click on one of our adverts (including those shown on other organisations' websites).
- Information about your device, how you access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers).

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires relating to our Services, we may collect:

- Personal data you provide about yourself anytime you contact us about our Services (for example, your name, username and contact details), including by phone, email or post or when you speak with us through social media
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on
- Your feedback and contributions to customer surveys and questionnaires

When you visit our stores

- Footage of you may be recorded on our CCTV systems

Other sources of personal data

We may also use personal data from other sources, such as specialist companies that supply information, online media channels, our Retail Partners and public registers. For example, this other personal data helps us to:

- Review and improve the accuracy of the data we hold; and
- Improve and measure the effectiveness of our marketing communications, including online advertising.

We use personal data to:	This means that processing your personal data allows us to:	Why do we process your personal data in this way?	Legal Basis
Manage and improve our day-to-day operations	Manage and improve our Websites	We use cookies and similar technologies on our Websites to improve our customer experience	**Legitimate Interests**
	Help to develop and improve our internal analytics, data management technology systems, know-how and the way we manage our business and our and present fraud or other crime	Some cookies are necessary so you should not disable these if you want to be able to use all the features of our Websites. You can disable other cookies but this may impact your customer experience. For more information about cookies and how we use them on our sites see the cookies and similar technologies section	
		We rely on the use of personal data to carry out market research and internal research and development, improve our business information technology systems (including security) and our product range and customer service. This allows us to serve you better as a customer. It is important for our business that our systems are used to detect and prevent fraud, other crimes and the misuse of services. This helps us to keep safe and secure our safety use our Services	
	Provide you with relevant personalised online advertising (including by email, post or online advertising), relating to our products and services, and those of our suppliers and Retail Partners.	We want to ensure that we provide you with relevant online advertising, including online advertising that you see on other organisations' websites and online media channels. We may also use your personal data in our marketing communications and those of our suppliers and Retail Partners.	[For most marketing communications, we rely on your consent, however there are situations in which it is our legitimate interests to do so.]
	As part of this, online advertising may be delivered to you based on your browsing of other organisations' websites and online media channels. We may also use your personal data in our marketing communications and those of our suppliers and Retail Partners.	You can change your marketing preferences with us when we engage with us, and at any time after that.	
		You also have choices when it comes to online advertising. We set out below your choices when it comes to cookies, and how you can control your online behavioural advertising preferences.	
Contact and interact with you	Contact you about our Services, for example by phone, email or post, or by other means such as social media posts that you have directed at us	We want to serve you better as a customer so we can personal data to contact you about our Services and our customer's interests in your communications.	**Legitimate Interests**
	Manage promotions and competitions you take part in, including those we run with our suppliers and Retail Partners.	We need to process your personal data so that we can manage the promotions and competitions you choose to participate in	
	Invite you to take part in and manage surveys and questionnaires and other market research activities carried out by Select & Save and by other organisations on our behalf.	We carry out market research and surveys from time to time. However, if we contact you about this, you do not have to take part in the survey. If you tell us that you do not want to take part in future market research, we will respect this choice. This will not affect your ability to use our Services.	
CCTV	To monitor the safety of our stores in order to prevent and detect crime and antisocial behaviour.	In order to protect our business, the brand, customers and colleagues	**Legitimate Interests**

How and why we use personal data

1) This section explains in detail how and why we use personal data

2) Our **Legitimate Interests** in using your personal data are:

3) Where we have mentioned above our use of your personal data is based on our "legitimate interests", these are:

- To service our customers' needs, including delivering our products and services.
- To promote and market our products and services.
- To understand our customers including their patterns, behaviours as well as their likes and dislikes
- To protect and support our business, colleagues, customers and shareholders.
- To test and develop new products and services as well as improve existing ones.
- For legal/regulatory purposes.

Sharing personal data with Service Providers

This section explains how and why we share personal data with Service Providers.

When we share personal data with these companies we require them to keep it safe, and they must not use your personal data for their own marketing purposes.

Service Providers

We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, storing and combining data, processing payments and delivering orders to you and share personal data that enable our Service Providers to provide their services.

Some of the Service Providers we work with operate online and offline media channels, and they place relevant advertising for our products and services, as well as those of our suppliers on those online media channels on our behalf.

Sharing personal data with other organisations

This section explains how and why we share personal data with other organisations.

We may share personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purpose of preventing fraud and reducing credit risk);
- To an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organisation receiving your personal data can use your personal data in the same way as us; or
- To any other successors in title to our business.

How we protect personal data

We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place.

We use computer safeguards such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to keep this data safe. We only authorise access to employees who need it to carry out their job responsibilities.

- We protect the security of your information while it is being transmitted by encrypting it using Secure Sockets Layer (SSL)
- We enforce physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data. We may occasionally ask for proof of identity before we share your personal data with you.

However, while we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the Internet to us.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by companies operating outside the EEA who work for us or for one of our service providers. If we do this we ensure that your privacy rights are respected in line with this Policy. The most common way we do this is to put in place a specific type of contract, or through an approved scheme such as the Privacy Shield.

How long we use personal data for

We will not keep your personal data longer than we need to, how long this is depend on several factors, including:

- Why we collected it in the first place;
- How old it is;
- Whether there is a legal/regulatory reason for us to keep it;
- Whether we need it to protect you or us.

Marketing and market research

This section explains the choices you have when it comes to receiving marketing communications and taking part in market research.

We will send you relevant offers and news about our products and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. When you register with us we will ask if you would like to receive marketing communications, and you can change your marketing choices at any time online, over the phone or in writing at any time.

We also like to hear your views to help us to improve our Services, so we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

Cookies and similar technologies

We use cookies and similar technologies, such as tags and pixels ("Cookies"), to personalise and improve your customer experience as you use our Websites and Mobile Apps and to provide you with relevant online advertising. This section provides more information about Cookies, including how we use them and how you can exercise your choices about our use of Cookies.

How we use Cookies

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device.

Cookies help us to provide important features and functionality on our Websites and we use them to improve your customer experience. For example, we use Cookies to do the following:

Improve the way our Website works	Cookies allow us to improve the way our Website works so that we can personalise your experience and allow you to see many of its useful features.
	For example, we use Cookies so we can remember your preferences when you return to our Website.
Improve the performance of our Website	Cookies can help us to understand how our Website are being used by visitors, by telling us if you get an error message as you browse our Website.
	These Cookies collect data that is mostly aggregated and anonymous.
Deliver relevant online advertising	We use Cookies to help us deliver online advertising that we believe may be relevant to you on our Website and other organisations' websites.
	Cookies used for this purpose are often placed on our Website by other organisations, and always with our permission. These Cookies may collect information about your online behaviour, such as your IP address and the website you arrived from. This means that you may see our adverts on our Website and on other organisations' websites. You may also see adverts for other organisations on our Website.
	To help us to deliver online advertising that is relevant to you, we and our partners may also collect through Cookies information about your desktop computer or other devices with other data that we have collected.
Measuring the effectiveness of our marketing communications, including online advertising	Cookies can tell us if you have seen an online advertising campaign or how you have interacted with it. This helps us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.
	We also use Cookies to measure the effectiveness of our marketing communications, for example, to see if you have opened a marketing email that we have sent you.

Your choices when it comes to Cookies

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device. You can find more detailed information about how you can control your browser Cookies at YourOnlineChoices.eu/details.

If you choose to disable some or all Cookies, you may not be able to make full use of our Website.

Where we display personalised adverts on other organisations' websites, the AdChoices icon will usually be displayed. Clicking on this icon will provide you with specific guidance on how to control your online advertising preferences. More information is available on the YourAdChoices website.

Subject Access Rights

You have the right to see the personal data we hold about you. This is called a Subject Access Request.

If you would like a copy of the personal data we hold about you, please write to:

Office Manager, 72 Hill Street, Birmingham, B5 4AH

You can also email us at customersupport@selectandsave.net

Other Data Protection Rights

In relation to your personal data, you also have right to:

1. Have inaccurate information corrected

Summary of the right:

If you believe we hold inaccurate or missing information, please let us know and we will correct it.

2. Object to our use of it:

Summary of the right:

- General objection - We will then consider you objection to our use of your personal data. If we believe your rights outweigh our interests in using your personal data, then we will at your request either restrict our use of it (see section 3 below) or delete it (see section 4 below).
- Objection in relation to direct marketing - If you make such an objection, we will stop using your personal data for direct marketing purposes.

3. Restrict our use of it:

Summary of the right:

There are several situations when you can restrict our use of your personal data, this includes (but is not limited to):

- You have successfully made a general objection (listed in section 2 above);
- You are challenging the accuracy of the personal data we hold;
- We have used your personal data unlawfully, but you do not want us to delete it

4. Have us delete it

Summary of the right:

There are several situations when you can have us delete your personal data, this includes (but is not limited to):

- We no longer need to keep your personal data;
- You have successfully made a general objection (listed in section 2 above);
- You have withdrawn your consent to us using your personal data (and we do not have any other grounds to use it);
- We have unlawfully processed your personal data

5. Complain to the data protection regulator

We'd like the chance to resolve any complaints you have, however you also have the right to complain to the UK data protection regulator (the ICO) about how we have used your personal data. Their website is https://ico.org.uk/.

More information on your Data Protection Rights

The ICO website https://ico.org.uk/ contains more detail on the data protection rights mentioned above.

Or if you would like to speak to us about these rights in more detail, please see the "How to contact us" section below.

How to contact us

If you have any questions about how we collect, store and use personal data please contact us.

Phone: 0121 626 2744

Email: customersupport@selectandsave.net Mail: Select & Save, 72 Hill Street, Birmingham, B5 4AH

All contact made to and from customers via the Customer Service Centres may be recorded for training and quality purposes.

This Policy was last updated on 14/02/2019