

PACIFIC JEWELS (UK) LTD PRIVACY POLICY

1. Introduction

Pacific Jewels (UK) Ltd respects the privacy of our consumers and visitors and recognises the importance of protecting the information collected about them. We have established procedures that ensure your personal data is processed in a responsible manner.

This privacy policy explains who we are, how we collect, share and process personal data, and how you can exercise your privacy related rights.

Pacific Jewels (UK) Ltd uses information from our interactions with you and other consumers, as well as third parties to help achieve our goal of providing the highest quality products and services.

For online visitors and consumers located in the EU/EEA, reference is made to relevant articles of the EU General Data Protection Regulation (EU) 2016/679 ('GDPR').

2. Who controls your personal data?

Pacific Jewels (UK) Ltd determines as the data controller the purposes and means of processing of your personal data. The data controller is legally responsible for the processing of your personal data and you can contact Pacific Jewels (UK) Ltd if you have any questions about our processing or if you wish to exercise your rights (please refer below paragraph 6).

Data controller contact details:-

Pacific Jewels (UK) Ltd

71-75 Shelton Street

London

Greater London

WC2H 9JQ

Pacific Jewels (UK) Ltd does not employ a global Data Protection Officer. For enquiries or questions to this Notice, please send an e-mail directly to our Privacy Responsible: admin@pacific-jewels.co.uk

3. How we process your personal data

All our activities are based on stringent ethical principles and legal requirements, and we are committed to protect the privacy of all consumers and visitors to our websites. For this reason, the way in which we collect and store information, including personal data, is dependent on how our website and related services are used. We do not collect any sensitive personal data about you.

In the following, you can read about the different processing activities Pacific Jewels (UK) Ltd may perform using your personal data.

3.1 Collection of data through your interaction with us

Various technologies may be used on our websites, e-mail and advertising services in order to improve them, make them more efficient and secure as well as improve your user experience. Such technologies may lead to personal data being collected automatically by us or by third parties on our behalf. Examples of such technologies include cookies and server communication. The provision of your personal data for this purpose is not a contractual requirement but will be processed as part of our web services. If you chose to opt out of these technologies, Pacific Jewels (UK) Ltd may not be able to provide you with all the relevant features on the website which may have an impact on your experience with the websites.

When you visit a Pacific Jewels (UK) Ltd website, your personal data can be processed for marketing and personalisation purposes through web-analytics, which may include; A/B testing and product browsing analyses, and analysis on traffic sources, internal search, purchase, devices, as well as

retargeting, through the use of cookies and similar tracking technologies. For more information on how we use cookies and similar technologies, please refer to section 4 below.

Use of retargeting technologies

This allows us to target and serve personalised advertisement to visitors online, who have already shown interest in our products or brand through interaction with our websites. Retargeting technologies analyse your previous behaviour on our website, to create a unique advertisement profile in order to show personalised advertisement across the internet. Our advertising partners may also present ads on behalf of us across the internet. These partners may collect personal about your visits on our websites as well as those on other websites working with the same advertising partners.

Social media partners

Our website may integrate with different social networks that you are using. This may happen when you use our “social media login” as a method for authenticating your account Pacific Jewels (UK) Ltd. By using this method for authentication, you accept that we receive your account information from the social network provider, to enable you to access your Pacific Jewels (UK) Ltd account. If you do not want this data transfer to take place, you can always create an account using your email, whereby we will not receive any data from the social network for this purpose.

We may also use the same social networks to collect data about you to measure ad- and campaign performance, building advertising audiences, improve ad delivery and to deliver personalized content. This data is collected using a pixel or similar technology. The data collected through these means may include, but are not limited to the web browser you use, online identifiers such your IP-address and/or information about the type of interactions you did whilst visiting our website e.g. conducting a purchase, browsing our products or signing up to our newsletter. For an overview of how each social network partner may process your personal data, please consult with the list below:

Facebook

We may process your personal data for both marketing and analysis purposes, unless our interests are outweighed by your rights to privacy and statutory freedom, cf. GDPR Art. 6 (1), (f). Our legitimate interest is based on your preferences, so that we can better customise our offerings to you – and ultimately offer products and services that better meet your needs and wishes. In addition, we have a legitimate interest in processing your personal data for analytical purposes.

Personal data processed by Pacific Jewels (UK) Ltd for marketing and personalisation may include;

Behavioural web data

When you visit our website, data is sent from your browser to our server. If you have enabled cookies and web-analytics, this data makes it possible for us to optimise our services and improve your experience on our websites and applications. The data is automatically collected through third parties on our behalf.

Behavioural web data may include personal data about how your browsing behaviour, such as navigation on our website, date and time of visit and document referrer. It may also include personal data about your system preferences and devices, such as user agent and IP address.

If you haven't enabled cookies, Pacific Jewels (UK) Ltd will only process your IP address and which browser, you use.

Gifting services

Pacific Jewels (UK) Ltd may also process your personal data if this has been provided from someone using our “send as a gift” service. Even if you do not have a Pacific Jewels (UK) Ltd account we may process your personal data to provide the “send as a gift” service if you choose to send a Pacific Jewels (UK) Ltd gift or if you are chosen by someone to be the recipient of a Pacific Jewels (UK) Ltd gift.

3.2 Surveys on customer satisfaction

We may ask you to complete surveys that we use for personalising your experience with Pacific Jewels (UK) Ltd and for research purposes to improve our general customer experience to increase customer satisfaction. For instance, we may utilize the information for marketing or re-targeting purposes and to show you more relevant content on the website, or use the information to identify which improvements in store or online, should be prioritized.

The completion of surveys are voluntary. The surveys about your user experience on the Pacific Jewels (UK) Ltd website or any other of our services may be completed through a webform or through email. The provision of your personal data for this purpose is not a contractual requirement, but is necessary for us to perform the consumer satisfaction survey.

Pacific Jewels (UK) Ltd processes your personal data from surveys on customer satisfaction based on our legitimate interest cf. GDPR Art. 6 (1), (f) to improve the general customer experience.

Personal data processed for surveys on consumer satisfaction may include:

Survey data through web forms and similar

Your satisfaction score, IP-address and user ID, your postal code and any comments you may provide us.

Survey data through email

The survey data may include; your contact information, purchasing tendencies and information about your shopping experiences with Pacific Jewels (UK) Ltd.

3.3 Direct marketing

With your permission, we may contact you directly using the information you have provided us (e.g. via postal services, email, text messages, phone calls, QR-codes or other electronic means) for marketing, advertising, e.g. newsletter, personalised offers and market analysis purposes.

Pacific Jewels (UK) Ltd processing of your personal data for direct marketing is not a contractual requirement, but an option for you, who is interested in receiving news about Pacific Jewels (UK) Ltd special offers. If you chose not to give your consent for this purpose, we will not send you any newsletters.

Pacific Jewels (UK) Ltd processes your personal data for direct marketing, including subscription to newsletters, based on your consent cf. GDPR Art. 6 (1), (a). You are always allowed to withdraw your consent (please refer below paragraph 6.6), but be aware that this will not affect the lawfulness of the processing based on consent before its withdrawal.

The personal data processed for direct marketing purposes include: contact information, your general interaction with Pacific Jewels (UK) Ltd; your use of loyalty programs; your reviews of products; your clicks/openings of newsletters; your web behaviour, your newsletter subscriptions and your participation in campaigns or events.

In Section 6 you can find information about your rights, such as how to withdraw your consent or change your personal details.

3.5 Your order and customer service

When you order from our website, we may process your personal data for the purposes of providing your order, including: to notify you of the status of your order or delivery, to comply with your queries such as answering a question about our products, to help you find a store near you, to fulfil your order, to process your payment by card and/or to provide consumer service to you.

The provision of the contact information is a contractual requirement and is necessary for Pacific Jewels (UK) Ltd to provide you with the requested services. It is not possible to make a purchase on Pacific Jewels (UK) Ltd website if you cannot provide us with the required information.

The processing of your personal data is necessary for us to fulfil our agreement with you or to handle your inquiries and the like before an agreement is entered into, cf. GDPR Art. 6 (1), (b) as well as the legitimate interest of Pacific Jewels (UK) Ltd in performing consumer service and follow up, cf. GDPR Art. 6 (1), (f).

Personal data processed by Pacific Jewels (UK) Ltd in relation to your order and consumer service management may include;

First and last name(s), invoice address(s), post/zip code, phone number, email address, credit and debit card information, consumer service correspondence on questions, queries and complaints.

4. Cookie notice

When you visit our website, the site asks your browser to store/access a small piece of data (text file) called a cookie - on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies.

We also use third-party cookies, which are cookies from a domain different than the domain of the website you are visiting, for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies as follows: essential cookies, analytical cookies, functional cookies, personalisation cookies and advertising cookies. To understand the details of these types of cookies and the purposes for which they are used, click here.

4.1 How to control and delete cookies

Our website contains a cookie consent tool that can be used to manage your cookie preferences. The tool will record when you have consented to our cookies and will ask for consent once a year to ensure web visitors stay up to date with changes to our cookies. The consent tool can be used to select and deselect all cookies, except essential cookies which cannot be disabled. To access the consent tool, click here anytime or use the link in the website footer.

Many of the cookies used on our website can be disabled either by using the consent tool or through your browser. To disable cookies through your browser, follow the instructions usually located within the "Help," "Tools" or "Edit" menus in your browser. Please note that disabling a cookie or category of cookies through the cookie consent module does not delete the cookie from your browser unless manually completed through your browser function.

In the links below, you can find guides on how to delete or block cookies in the most commonly used internet browsers:

Chrome

Firefox

Safari

Windows Edge

Please note that information collected prior to your change of cookie preferences may still be used even though your preferences are changed. However, no further information will be collected from the moment you choose to disable certain cookies.

5. With whom will your personal data be shared?

Pacific Jewels (UK) Ltd uses service providers who process your personal data on our behalf.

The services provided by third parties may include; authentication, hosting and maintenance services, analysis services, mail messaging services, delivery services, handling of payment transactions, payroll providers, address and mail checks.

These third parties are our data processors and may only process personal data to the extent necessary in order to deliver their services. Our data processors are contractually obliged to treat such information in the strictest confidence.

Some of our data processors are situated outside the EU/EAA. Consequently, we will share your personal data with countries outside the EU/EEA. However, if your personal data is transferred to a third party outside of the EU/EEA, such transfer will be safeguarded by either:

The country in question is considered a safe third country, subject to an adequacy decision from the European Commission. A list of countries outside the EU with an adequate level of protection can be found [here](#).

The third party concerned must sign up to the European Commission's Standard Contractual Clauses (SCC's) for the transfer of personal data to third countries and further implement necessary technical and organisational safeguards.

The third party in question is certified according to GDPR Art. 40; or

The third party in question has a set of approved Binding corporate Rules.

To obtain a copy of such legal basis of transfer, please contact Pacific Jewels (UK) Ltd by sending an email to admin@pacific-jewels.co.uk

We may disclose your information to the extent that we are required to disclose or share your personal data in order to comply with legal obligations or directives of the court or other competent legal body, or to enforce or apply our privacy notice and other agreements; or to protect the rights, properties or security of Pacific Jewels (UK) Ltd, our employees, consumers or others. This includes exchanging information with other companies and organisations with the aim of protecting against fraud and reducing credit risk.

If we choose to participate in an alternative dispute resolution via the online dispute resolution platform, we may disclose your personal data to the European Commission in their function as operator of this platform and to any alternative dispute resolution provider designated to handle the dispute.

Please note that the information you publish or disclose through your interaction with Pacific Jewels (UK) Ltd (e.g. personal data contained in images, stories, comments and videos that you submit) will become public information and may become available to visitors to the site as well as the general public.

6. Your rights

You can always access and change your personal data by logging into your account on Pacific Jewels (UK) Ltd and entering your account profile information. Click "My Profile" or "My Account" to access your personal information.

If any of the information you have provided to us has changed — for example, if you change your email address or other contact information, or if you want to delete your registration with us — you can notify us by editing your information on the "My Profile" or "My Account" pages or sending an email with the changes to: admin@pacific-jewels.co.uk

Should we have misgivings regarding your identity, we may ask you to provide identification.

In general, you have the following rights:

6.1 The right to request access to your personal data

You are entitled to gain access some of the personal data you provide to Pacific Jewels (UK) Ltd. By contacting us [here](#), you may request details of the information about you that we hold and process, including the purpose for which it is used.

You can also access your personal details by logging into your Pacific Jewels (UK) Ltd account on www.pacific-jewels.co.uk and entering your account profile information. Click on “My Profile” or “My Account” to gain access to your personal details.

6.2 The right to amend and/or erasure your personal data

You have the right to request correction, appendage, erasure or blockage of your stored personal data. To do so, kindly contact us here. If for any reason we cannot comply with your request, we will contact you.

6.3 The right to restrict the processing of your personal data

Under certain circumstances, you have the right to restrict the processing of your personal data. To request restriction, kindly contact us here

6.4 Right to data portability

You have the right to receive your personal data (solely relating to you) in a structured, commonly used and machine-readable format (“data portability”) and the right to transit this data to another data controller. To request data portability, kindly contact us here

6.5 Right to object to the processing of your personal data and to unsubscribe

You have the right to ask us not to process your personal data when processing is based on a legitimate interest pursued by Pacific Jewels (UK) Ltd e.g. for marketing purposes, as stated above. You can always exercise your right to object at any time by contacting us here. .

Emails sent to you containing newsletter or marketing content include the option to unsubscribe by following the instructions set out in the email. If you do not wish to receive emails from us and want to withdraw your consent (please refer below sect. 6.6 on withdrawal of consent in general), you can simply click the unsubscribe hyperlink and we will stop sending you emails.

For all other types of messages you may receive from us, such as maintenance or announcements or administrative notifications, the receipt can only be terminated by deleting your account. These messages are a mandatory part of user accounts and the related use of our websites. Log in to your account, go to “My Profile” or “My Account” page and click 'Delete Account'. If you can't login, please contact consumer relations.

6.6 Right to withdraw your consent at any time

You are at any time entitled to withdraw your consent to our processing of your personal data to the extent our processing is based on a consent. The withdrawal of consent shall, however, not affect the lawfulness of processing based on consent before its withdrawal. Contact us by sending an email to admin@pacific-jewels.co.uk to withdraw your consent.

7. Retention of your personal data

Pacific Jewels (UK) Ltd will not retain your personal data for longer than is necessary for the purposes for which it is processed as part of the processing activities. In the following, you can find our retention periods for the processing activities performed by Pacific Jewels (UK) Ltd :

Pacific Jewels (UK) Ltd account management

For information about the processing activity, please refer above paragraph 3.4.

No personal data will be retained unless required by local mandatory law. Some information may though be stored in an irrevocable anonymised form for the purpose of statistics.

Direct marketing, including newsletter subscription

For information about the processing activity, please refer above paragraph 3.3.

Marketing e-mails recipient

A marketing emails recipient is someone who has not signed up to a Pacific Jewels (UK) Ltd account, but who has signed up for marketing emails(e.g. through online channels, guest check-out, in stores, etc.)

How do we define an inactive recipient of the newsletter?

An inactive newsletter subscriber is someone who has not opened and clicked an email for a period of 24 months. If a newsletter subscriber, makes an identified purchase either instore or on a Pacific Jewels (UK) Ltd website, they are automatically transferred to new status and therefore follows the inactive definition of this new status.

What personal data will be erased if a newsletter subscriber is inactive?

First name, Last name, Email address, Address, Phone number.

When will personal data be erased?

Personal data will be erased if the newsletter subscriber has been inactive for 24 months.

What personal data will be retained after the 24 months inactive period?

No personal data will be retained unless required by local mandatory law. Some information may though be stored in an irrevocable anonymised form for the purpose of statistics.

Your order and Customer Service

For information about the processing activity, please refer above paragraph 3.5.

Purchaser - no account/guest check-out

Someone who has made an identified purchase either online on a Pacific Jewels (UK) Ltd website.

How do we define an inactive customer?

An inactive consumer is someone who has not engaged with us by making an identified purchase either instore or online on a Pacific Jewels (UK) Ltd owned website for a period of years from the last engagement.

What personal data will be erased if a consumer is inactive?

First name, Last name, Email address, Address, Phone number.

When will personal data be erased?

Personal data will be deleted if the consumer has been inactive for up to 5 years.

What personal data will be retained after a 5 years inactive period?

No personal data will be retained unless required by applicable local law. Some information may though be stored in an irrevocable anonymised form for the purpose of statistics.

Collection of data through your interaction with us for marketing and personalisation

For information about the processing activity, please refer above paragraph 3.1.

Web Visitors

A web visitor is someone who has visited a Pacific Jewels (UK) Ltd owned website.

How do we define an inactive web visitor?

An inactive web visitor is someone who has not visited a Pacific Jewels (UK) Ltd owned website within a continuous period of 24 months.

What personal data will be deleted if a consumer is inactive?

If no consent to cookies:

IP address and web user agent

If consent to cookies:

Content data, A/B test and product browsing analytics, traffic source analysis, internal search analytics, purchase analytics, device analytics, marketing retargeting etc.

When will personal data be erased?

Personal data will be erased 24 months after it is collected.

What personal data will be retained after a 24 months inactive period?

No personal data will be retained unless required by local mandatory law. Some information may though be stored in an irrevocable anonymised form for the purpose of statistics.

8. Complaints

Complaints must be lodged directly with the English data protection authority:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Web: <https://ico.org.uk/>

Tel: 0303 123 1113 (local rate)

Fax: 01625 524 510

9. Changes to this notice

Pacific Jewels (UK) Ltd regularly reviews our privacy notice in order to keep it up to date and compliant with privacy and data protection principles. This privacy notice may be changed from time to time in order to keep pace with new developments and opportunities relating to the Internet and to stay in line with relevant data protection legislation. Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, may be notified to you by email.