

# AFFINION INTERNATIONAL LIMITED COMPANY PRIVACY AND COOKIES POLICY

The privacy policy sets out how we use any personal information that you give to us, or that we may collect or otherwise process in the course of providing services to you.

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## 1. Who We Are and About this Privacy Policy

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This document sets out the privacy policy of Affinion International Limited, (“we”, “us”, “our” or “Affinion International Limited”) in relation to the provision of all our consumer services and our websites. These include any services that you enrol in or otherwise subscribe to and your correspondence with us from time to time in relation to these, whether this be:

- online through our service specific and other company websites;
- via the telephone when you call our customer service teams;
- when you subscribe or communicate with us in writing by email or post;
- when we co-ordinate with other institutions in order to provide the relevant services to you (for example insurance underwriters, credit card providers and your bank).

This document explains how we use and process your personal information (meaning any information about you which is personally identifiable or can be related back to you like your name, date of birth, credit or debit card numbers, address, telephone number, email address, preferences, service selections and queries and is generally referred to throughout this policy as “your information”).

## 2. How We Collect and Use Your Personal Information

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### 2.1 General

When you subscribe to any of our services and/or communicate with us about these, you may be asked to provide your information in order to:

- authenticate your identity;
- register you to receive the relevant services including co-ordinating with other partners in order to do so and to provide such services;
- allow us to improve our services to you or to develop new services;
- provide you with marketing materials, but only where you have indicated your consent to this (see below for details);
- process any query or complaint;
- respond to a survey or update your information.

By providing such personal information, you fully understand and consent to the collection and processing of such information.

We may record or monitor calls made by you to our customer service desks for quality assurance and training purposes. However, we will always inform you if such recording or monitoring is taking place.

### 2.2 Information Sharing, Marketing and Disclosure

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We may co-ordinate with third parties in the provision of your selected services to you (for example your bank, insurance underwriters and credit providers). From time to time we may ask your card issuer to update us with any changes to the information they have provided to us, for example, by providing us with any updated or new card numbers or expiry dates.

In addition, and with your consent, we (and if applicable, our partners or other trusted third parties) may use your information for certain marketing activities. It is up to you whether we use your information in this way.

Our consent notices provided to you when you subscribe for any of our services will generally ask for your permission to send you marketing communications. Such consents relate to:

- communications with you from time to time by email and (where you provide us with those details either via the website(s) or elsewhere) by mobile (using SMS or, if your mobile device permits, EMS or MMS messages or similar technologies) and occasionally by post, with information, offers and other material from Affinion International Limited or any of its affiliates which may interest you;
- making your information available from time to time to trusted partners and third parties, for them to communicate with you about their products and services as per above.

We may also use your information to conduct market research, for example to ask you to participate in a survey about topical issues, conducted by us or trusted partners or third parties. We will always try to tell you before you participate in the survey how any information you provide in the survey will be used.

Sometimes we may enable third parties acting on our behalf to analyse your information, in a non-personal identifying form, (generally in the form of statistics), so that we can identify trends about usage of our website(s) or services and improve them.

We may disclose your information to the marketing partner that provided you with details of our offer to enable them to track the offer that you accepted from us. Data shared with the

marketing partner may include name, mailing address and/or the status of your membership. We may also request non-personally identifiable information from you, such as annual income, buying preferences, or your age, also known as demographic and profile data, though this information is optional.

We may use this data to improve and enhance your experience on the Affinion International Limited websites. We may also share this information with others, such as advertisers interested in advertising on the Affinion International Limited websites, in aggregate, anonymous form, which means that the shared information will not contain nor be linked to any personally identifiable information about you or any other person.

Additionally we reserve the right to access and disclose your information in order to comply with applicable laws, to comply with lawful requests from governments, law enforcement agencies or parties whose request we reasonably consider to be justified in connection with any allegations by any party about your abuse of our services, to operate our systems properly or to protect ourselves or our users.

### 3. Automatic Information

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Please note that this section is only relevant in relation to information that we may collect and process in connection with your use of our websites.

#### 3.1 Cookies

##### Cookies and Logfiles

This section of our privacy policy sets out how we use cookies and similar technologies (“cookies”) on and in connection with this site. Cookies are text files containing small amounts of information which are downloaded by your internet browser and stored on your PC or other device when you visit a website.

##### How we use information we collect through Cookies

We store information that we collect through cookies, log files, clear gifs, and/or third party sources to create a summary of your preferences. We tie your personally identifiable information, and/or your membership usage history in order to provide tailored promotions and marketing offers, to improve the content of the site for you and/or to determine your preferences.

We may match information collected from you through different means or at different times, including, for example, information collected online and offline, and use such information along with information obtained from other sources, including third parties. To do this, it is often necessary to share this information with carefully selected vendors and business partners we work with, such as companies that perform marketing services and other business operations for us.

##### More information about cookies

We use session and persistent cookies on this site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time.

You can remove persistent cookies and reject persistent and session cookies by following the directions provided in your Internet browser’s “help” file or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). If you reject persistent or session cookies, you may still use our site, but you may not be able to access all the site’s functionality or your access may be limited.

##### How we use cookies

We use cookies to:

- remember choices you have made and personalise your use of the site. This includes cookies that:
  - store your password(s) for and keep you logged into this site so that you don’t have to enter passwords more than once per visit; and
  - remember and recognise you on subsequent visits to this site,
- identify how you use this site, including tracking how you use the site, such as information on where you came from, what content you viewed on the site, and the duration of your visit; and
- deliver content and advertising more relevant to you and your interests. This allows us to serve you more relevant content and advertising when you use our products and services and not to serve you content or offers you may already have opted-out of. This includes cookies used by advertising networks, which may be subject to a separate privacy policy on how the advertising network uses information they collect. Please see the How we use third party cookies for advertising and re-targeting purposes below for further information.

We link the information we obtain from or store in cookies to any Personal Information that we gather about our members (see How we use information we collect through Cookies above).

### **How we use third-party cookies for advertising and re-targeting purposes**

We may also use cookies to enable the use of advertising technology to serve you advertisements that we feel may be relevant to you when you visit search engines, our site and/or third party sites upon which we advertise.

This technology uses information about your previous visits to our site and the third party sites upon which we advertise to tailor advertising to you. In the course of serving these advertisements, a unique third-party cookie may be placed or recognised on your browser to enable us to recognise you.

This site also uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyse how visitors use the site. Information about your use of this site (including your IP address) will be transmitted to and stored by Google on servers in the US, and Google will use this information to evaluate your use of the site, compile reports on website activity for us, and provide other services relating to website activity and internet usage, but will not associate your IP address with any other data held by Google. For more information on the use of Google Analytics, including how to opt out, visit <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>.

### **Web Beacons**

We use web beacons, provided by our ad serving partner, to help manage our online advertising. These web beacons allow us and/or our ad serving partner to access individual cookies when a browser visits this site. This allows us to identify which advertisements or listings served by our ad serving partner bring users to our website.

Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We link the information gathered by clear gifs to the Personal Information we gather about our members (see How we use information we collect through Cookies above).

### **Logfiles**

Like many websites, we gather certain information relating to website use automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and clickstream data. We use this information, which does not by itself identify individual users, to analyse trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. After collection, during our processing of the data, we link this automatically-collected data to the Personal Information that we hold.

### **Third party websites using cookies**

Our websites may contain links to third party websites some of which may also use cookies. This Privacy Policy does not cover third party websites which will be subject to their own privacy and cookies policies. Affinion International Limited does not have access to or control over cookies or other features used by such sites. Please contact them directly for more information about their privacy practices.

### **3.2 Internet Protocol (IP) Address**

Where you are using our websites, we may use your IP address to help diagnose problems with our server and to administer our website. Your IP address may also be used to help identify you for the duration of a session and to gather broad demographic information. Your IP address will never be linked to any personally identifiable information unless you are in the process of making a purchase, in which case the link between this information will terminate upon your final purchase.

### **3.3 Clickstream**

As you use the Internet, a trail of electronic information is left at each web site you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server.

Clickstream data can tell us the type of computer and browsing software you use, the address of the web site from which you linked to a Affinion International Limited website, and, in some instances, your e-mail address. We may use clickstream data to determine how much time visitors spend on each page of our site, how visitors navigate throughout the site and how we may tailor our web pages to better meet the needs of visitors. This information will only be used to improve the Affinion International Limited web sites. Any collection or use of clickstream data will be anonymous and aggregated and will not contain any personal information except where you have selected an email address that identifies your name.

## **4. Unsubscribing/Amending your information**

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You can update and correct your information held by us by sending an email to [enquiries@sentinelgold.co.uk](mailto:enquiries@sentinelgold.co.uk) or writing to Affinion International Limited, Charter Court, 50 Windsor Road, Slough, Berkshire, SL1 2EJ or by calling 0800 023 4318.

You can remove your information from our marketing database entirely by emailing, writing or calling us using the contact details above, specifying your name, the email or other address/ telephone number you used to register with us and, if referring to a web registration, your user name in the email.

If you only want to remove your information from marketing communications in relation to a specific service simply email, write to us or call us using the above contact details with the information above and the name of the service.

Alternatively, whenever we contact you, (for example to send you an email newsletter which you have requested) you will normally find an email or other address at the bottom of the email, which you can use to tell us if you no longer wish to receive the newsletter or other communication in question.

## 5. Security

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Securing your personal and non-personal information is very important to us. All customer databases are held in a secure environment and (except for law enforcement authorities in limited circumstances), only those Affinion International Limited employees or other persons who need access to your information in order to perform their duties are allowed such access. Any of these employees or persons who violates our privacy and/or security policies may be subject to disciplinary action, including possible termination and civil and/or criminal prosecution.

Where you are using our websites, we attempt to provide for the secure transmission of your information from your computer to our servers by utilising encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Affinion International Limited, and Affinion International Limited and you, will be free from unauthorised access by third parties, such as hackers.

Our websites utilise Standard SSL encryption on pages where secure information is transmitted over the Internet. We also use Verisign as our Certificate of Authority. If you would like more information on our Verisign Certificate, click on the seal below.

## 6. Business Transfers

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In the unlikely event that we sell or otherwise dispose of some or all of our business to another party, we reserve the right to transfer your information as part of any assets sold or disposed of.

## 7. Transfers Overseas

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Your information may be transferred outside of the European Economic Area for processing.

Affinion International Limited's affiliate companies in the United States to which your information may be transferred are part of the US Safe Harbour. For more details on this you can see the Information Commissioner's site at: [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)

Any transfer of your data is done in circumstances ensuring that your data is processed only in accordance with this privacy policy and the UK's Data Protection legislation. By registering on this site and consenting to these terms, you are consenting to this transfer.

## 8. Other Sites

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Our web sites may contain links to other websites. Other web sites may also reference or link to the Affinion International websites. Affinion International Limited is not responsible for their privacy practices or the content of such other sites.

## 9. Your Acceptance of this Policy

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In providing personal information to us or using our web sites you signify your assent to our Privacy Policy. If you do not agree to this policy, please do not use Affinion International Limited websites or provide your data to us. This Privacy Policy supersedes all privacy policies and other similar standards previously issued by us. Since the privacy standards set forth herein are subject to updates and other changes from time to time, please note that this Privacy Policy is subject to change at any time. In the event of any such changes, we will notify all of our members and other customers of such changes in the manner to the extent required by law. Your continued use of our site and services following the posting of changes to these terms means you accept these changes.

**This policy was last updated 19<sup>th</sup> April 2012.**