

## blu PRIVACY NOTICE

We believe in creating something better. We understand you are trusting us with information that is important to you, and we want to repay your trust by being transparent about how we use and protect your information.

This Privacy Notice explains the privacy practices for our *Myblu* vaping device, applications (including the *Myblu* app), software, websites, APIs, products and services (our “blu Services”). Specifically, we’ll tell you about:

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### The information this Privacy Notice covers

This Privacy Notice covers personal information. Personal information is any information that tells us something about you. [\[Read more\]](#)

[This could include information such as your name and contact details. Some personal information is categorised as "special" under data protection legislation. This includes information relating to health, racial or ethnic origin, and religious or philosophical beliefs. We may process special categories of personal information in limited circumstances with your explicit consent unless we have a legal reason to do so without your consent. Where we ask for your consent, we will explain at the time the purpose for which the personal information will be used.]

### How we collect personal information

We collect your personal information to provide you with our blu Services, so that we can stay in touch with you, to improve and personalise our blu Services for you, to handle any questions or complaints you may have, and to comply with our regulatory obligations. This involves:

[Information you provide to us](#) [\[Read more\]](#)

[We collect information from you when you register an account with us, when you pair your *Myblu* device with the *Myblu* app and when you make a purchase through our website. This includes the information we need to identify you to comply with our regulatory obligations. See the [Age-verification and identification](#) section for more.

We collect information you voluntarily provide to us, such as your name and contact details, when you make an enquiry or complaint, sign up for blu newsletters, and when you participate in our surveys.

You volunteer information when you leave us feedback or post about yourself on our social media accounts or any public areas of our website.]

[Information we collect automatically or that is generated when you use blu Services](#) [\[Read more\]](#)

[We collect some information about you automatically, such as information collected by cookies, web beacons and similar technologies when you use, access or interact with us via our website or using the Myblu app.

If you decide to pair your Myblu device with the Myblu app, we collect the information generated by your use of your Myblu device.]

[Information we collect from third-parties](#) [\[Read more\]](#)

[Some of the information we collect about you comes from third-parties such as analytics service providers, social media providers and marketplaces. If you sign up for a blu account using your Facebook or Twitter account, we receive information from that service depending on the settings of your social media account. You can change how the information is shared with us by other services by changing your settings with that service.]

## What personal information we collect

**Identity Data** is information that specifically identifies you. It includes your first name, last name, username or similar identifier, title, address, date of birth and gender. We use this information to register and create your account, and to ensure we are dealing with the correct adult vaper. In some cases, we may need your national ID details. [\[Read more\]](#)

[We need to conduct age-verification so that we can comply with applicable local laws and regulations that restrict who we offer our blu Services to.]

**Contact Data** includes billing address, delivery address, email address and telephone numbers. We use these details to deliver our blu Services to you.

**Financial Data** includes your bank account and payment card details. Using our website, you submit these details to our payments service provider, Adyen, when you buy blu products online.

**Transaction Data** is generated as a record of your purchases through our website and includes details about payments to and from you and other details of products you have purchased from us.

**Account Profile Data** is the personal information contained in your account. It includes your username and password details as well as your Identity Data, Contact Data and Communications Data. It is also a record of your engagement with us through your feedback and survey responses.

**Communications Data** includes your preferences in receiving product information from us and your communication preferences to ensure we engage with you as you wish.

**Technical Data** is the information behind the technology and the devices you use to connect with the Myblu device, our website and the Myblu app. It tells us how our products and services are performing and we use this data to make our blu Services operate better. [\[Read more\]](#)

[Technical data includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and the Myblu app. It also includes the data required to establish a connection between your mobile device and your Myblu device if you choose to pair your Myblu device with the Myblu app.]

**Usage Data** is the information generated, including using cookies, as you use our blu Services. We use third-party analytics providers to analyse how you are using those blu Services. This data, especially when we use it as Aggregated Data, tells us how the blu experience could be improved and what we can do to enhance the services we offer. [\[Read more\]](#)

[We use a third-party service, Google Analytics, to collect standard internet log information and details of your behaviour patterns as you navigate around our website or the Myblu app. It does this using information from cookies. This helps us to find out the number of users to the various parts of our website or the Myblu app and how they interact with the content on the site. We also use this information to maintain and monitor the performance of our website and the Myblu app, and to look for ways of improving our website and the Myblu app and the services it offers you. This information does not identify any individuals. You can see our Cookies Policy [\[here\]](#).]

**Third-Party Data** is the information we receive from analytics providers as mentioned above under Usage Data and, for instance, when we analyse your feedback on review sites. We also receive information about you from social media providers when you register for a blu account via your social media accounts like Facebook or Twitter. [\[Read more\]](#)

[This might include information on your interests, comments and content you have posted on social media, user name, and other online activities. You can find information on the data sharing policies and practices of the social media providers on their websites, and we encourage you to read this information and adjust your settings to your personal preferences.]

**Myblu Device Data** is the information generated when you use your Myblu device. Your Myblu device collects data to estimate a variety of metrics like puff count, consumption, device battery life and location. Some of the Myblu Device Data is health information, a special category of personal information for data protection purposes. [\[Read more\]](#)

[The data collected varies depending on the Myblu device you use. When your Myblu device syncs with our applications or software, data recorded on your device is transferred from your device to our servers. The data collected by your Myblu device will remain anonymous and is only used by us as Aggregated Data for statistical and product research purposes until you choose to pair your Myblu device to the Myblu app. Once paired, you will be able to view your Myblu Device Data using the Myblu app. We use your Myblu Device Data to create a better blu experience more personal to you.]

**Location Data** is used in some features of our Services. Precise location is generated from GPS signals, device sensors, Wi-Fi access points, and cell tower IDs. Pairing your Myblu device with the Myblu app uses Bluetooth technology, which relies on location data from your mobile phone to work. You can always restrict access to your precise location. This will affect the connection between your Myblu device and the Myblu app. We may also derive approximate location from your IP address.

**Aggregated Data** is derived from your personal information but is not considered “personal data” in law as it is anonymous and the data does not directly or indirectly reveal your identity. This data is used for statistical research and to inform business strategy. [\[Read more\]](#)

[We collect, use and share Aggregated Data, such as statistical or demographic data. Aggregated Data may be derived from personal information (for example, we may aggregate all our website visitors’ website usage to calculate the percentage of them accessing a specific website feature) but it does not identify individuals. However, if we combine or connect this Aggregated Data with your personal information in a way that directly or indirectly identifies you, we treat the combined data as “personal data” which will be used in line with this Privacy Notice.]

## **Cookies**

We collect website and app Usage Data and Technical Data automatically from your mobile or other device using cookies, web beacons and similar technologies. [\[Read more\]](#)

[A cookie is a small file of numbers and letters that we put on your mobile or other device if you agree. These cookies allow us to distinguish you from other visitors to our website or the Myblu app and tells

us how you are using our website or the *Myblu* app. Some cookies are necessary to provide you with a good experience as you browse; others help us to gather information that informs how we can improve our website or the *Myblu* app for you.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. If using the *Myblu* app, you can also manage app cookies within your mobile device settings. If you do block cookies there may be parts of our website and the *Myblu* app that you will be unable to access or that will not function properly.

Our cookies help to:

- make our website and the *Myblu* app work as you would expect;
- remember your settings during and between visits;
- improve your and other users' experiences;
- allow you to sign up to receiving product information and updates; and
- improve the speed/security of our website and the *Myblu* app.]

For more information about our use of cookies, please see our Cookies Policy [\[here\]](#).

### **Age-verification and identification**

You must be at least 18 years of age to use our blu devices, our website and the *Myblu* app. This is to ensure that we meet our legal obligations. Before you enter our website you will be asked to verify your age. When you register an account via the website or the *Myblu* app, or when you purchase a blu product or service, you will need to provide Identity Data so that, with your consent where necessary, we can authenticate your age. [\[Read more\]](#)

[Your Identity Data is sent to our service provider, Persona, who checks the information against public sources to verify your age. If for some reason Persona are not able to verify your age from the information provided, you will be asked to consent to a full identity check by submitting evidence in the form of National ID, such as your passport, directly to Persona.]

We will keep your Identity Data all the time that you are a user of our blu Services and for the period we need to hold it for legal reasons after that. After your identity check is completed your National ID document is not kept by us or by Persona.]

Not participating in the age-verification or identification process will obstruct your interactions with us. If you have any questions about the age-verification or identification process, please contact our Customer Service [here](#) or via [support@blu.co.uk](mailto:support@blu.co.uk) and an advisor will be happy to help you.

The *Myblu* device, our website and the *Myblu* app are not intended for children and we do not knowingly collect data relating to children.

### **How we use your personal information**

Your personal information is used for the following purposes:

**Account creation.** If you sign up for an account with us, either on our website or via the *Myblu* app, we use your personal information to register your account and carry out age-verification. We also use your information to pair your *Myblu* device to the *Myblu* app.

**Delivering your blu products and services.** We use your personal information to deliver our products and services to you. This includes contacting you about your orders, managing payments, fees and charges, collecting and recovering money owed to us, delivering products and services to you, and providing you with information about the products you have purchased, including any product safety information. [\[Read more\]](#)

[When you submit your Financial Data via our website, your details are transmitted directly to our

payments service provider, Adyen. [We do not store your Financial Data.](#)]

**Account management.** We use your personal information to administer your account and to manage our relationship with you, which will include notifying you about any changes to our terms or privacy notice, enabling you to use promotional codes or discounts, using our Live Chat function, and responding to your queries.

**Providing Myblu vaping device metrics.** If you have paired your Myblu device with the Myblu app, we use your personal information when we give you the ability to view your Myblu Device Data in the Myblu app. We use the information to see how you are using the Myblu device and the Myblu app, and to create a more personal service experience for you. It also gives us the chance to create something better for you and our other users as well as monitor the performance of your Myblu device to ensure it is operating as it should.

**Providing customer service.** If you contact us, we will save your contact details to respond to your query. It is also possible to contact our Customer Service through our Live Chat function available on the website. The information you provide in the chat is saved in our system to ensure you receive the correct support from our Customer Service team and to inform our understanding of your blu experience.

**Personalising your blu experience.** We use information about your behaviour on our website and your use of the Myblu device and the Myblu app (and, with your agreement, your location) to personalise your blu experience by tailoring our communications to your preferences. [\[Read more\]](#)

[\[If you are registered to receive product information communications, we use information about your online activity to inform the email/SMS/phone updates you receive from us with news and product information. You can opt out of receiving these communications in the preference centre in your account. You can also unsubscribe through a link in every communication we send out.\]](#)

[We use information about your online activity together with your response to our newsletter to personalise your online browsing and shopping experience on our website and in the Myblu app to ensure you will see content that is relevant for you.\]](#)

**Providing product reviews and feedback.** If you leave a review about a blu product on our website or the Myblu app, we collect personal information about your experience as a vaper. You can choose what information you provide. The information is collected to give readers of the review a better understanding of our products and services. We analyse this feedback and feedback on other review sites to learn how we can make improvements to our products and services.

**Events.** We use your personal information when we invite you to events hosted by us or on our behalf. If you participate in an event, we collect information about you to better understand your preferences. Offline data collection may be part of a promotional initiative, such as a prize draw or competition.

**Conducting surveys.** Occasionally we invite you to fill out a questionnaire. You are free to choose if you would like to fill out the questionnaire. The information you provide will be used to better understand your preferences and to serve you better.

**Product Information.** If you are an existing customer or if you have made a sales enquiry, we may contact you by email / SMS / telephone /post with product information about our products which are similar to the products previously provided to you, unless you have told us you do not want to hear from us. Otherwise we will only contact you if you have agreed we can.

Where appropriate and with your consent (by setting your preferences in the preferences centre during or at any time after the registration process), we may pass your information to our affiliate Imperial companies where you are located so that you receive further personalised information and services that might interest you. You may ask us at any time not to use your information by contacting us using the contact details below. [\[Read more\]](#)

[In order to provide you with a personalised shopping experience, we will send you product information based on your preferences. These preferences can be based on your online behaviour and/or surveys that you have participated in. Based on this, personalised emails will be sent out (if you are subscribed) . Based on your online behaviour and preferences, our website and app might also be adjusted accordingly. In certain cases, your personal information will be matched to personal information received from third-parties to build up a profile. This profile will give us insight on how we can personalise your experience with us.

You can ask us to stop sending you product information messages at any time by logging into the website and unchecking relevant boxes to adjust your preferences or by following the opt-out links on any product information message sent to you. You can also opt-out by contacting us at any time. Where you opt-out of receiving these product information messages, this will not apply to personal information provided to us as a result of a product purchase, product experience or other transactions. Therefore, if you opt-out of product information messages, we will still need to send you service communications from time to time, such as information about changes to our services or product recalls.]

**Research and analysis.** We use all the data we collect (largely as Aggregated Data), including your feedback, your responses to surveys, your online behaviour and your use of your *Myblu* device and the *Myblu* app, to conduct research and analysis to improve and develop our business. [\[Read more\]](#)

[We carry out research and analyse the data we have (usually in aggregated form, to improve our blu Services, our marketing strategy and our customer relationships and experiences. We also use and share our statistical data and the results of our research and analysis to improve our business and develop new products and services.]

**Administering and protecting our business.** We use all the data we collect to administer and protect our business, our blu devices, our website and the *Myblu* app, and our information and systems. This includes carrying out activities like trouble-shooting, data analysis, testing, system maintenance, system security, support, reporting and hosting data.

**blu Care.** If you are new to vaping and sign up to our blu Care service, we will use your data in order to provide you with information regarding vaping and blu products via a series of text messages. This includes sending you text messages in order to help you use our vaping devices and address any questions you might have about vaping. You can unsubscribe from our blu Care service at any time by following the opt-out instructions on each text message that you receive or by contacting us using the contact details below. [\[Read more\]](#)

[For more information about our blu Care service, please visit: <https://www.blu.com/en/GB/blu-care>]

**When you purchase blu products in a market place.** If you buy a blu product in a market place, we will receive information about your purchase and personal data held by the market place.

### **The lawful basis that allows us to use your personal information**

We need to tell you the lawful basis that permits us to use your personal information. [\[Read more\]](#)

[We may use your personal information under more than one lawful basis depending on the specific reasons for using it. Please contact us if you need more details about the specific lawful basis we are relying on to process your personal information.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we will only process your personal information without your knowledge or consent where this is required or permitted by law.]

Our use of your personal information is allowed:

- with your permission (for example, where the information is sensitive like health information);
- where we need your personal information to enter into a contract with you (for example, when you make a purchase via our website);
- where we perform tasks in the public interest or to comply with a legal obligation (for example, where we need verify your age or your identity); and/or
- where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests (for example, when we use your information to help us improve and develop our Services).

[\[Read more\]](#)

[The table below provides more detail about the personal information we use and the legal basis that we rely on in each case.

Purpose	Personal information used	Lawful basis including basis for legitimate interest
Age-verification and identification	Identity Data	(a) Consent  (b) Public interest and compliance with legal obligation
Account creation.	Identity Data, Contact Data, Account Profile Data	(a) Performance of a contract with you  (b) Consent
Delivering your blu products and services.	Identity Data, Contact Data, Financial Data, Transaction Data	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to recover debts due to us and to protect our business)
Account management	Identity Data, Contact Data, Financial Data, Transaction Data	(a) Performance of a contract with you

		<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to develop our relationship with you to progress our business)</p>
Pairing your <i>Myblu</i> device to the <i>Myblu</i> app and providing your <i>Myblu</i> vaping device metrics	Technical Data, Usage Data, Third-Party Data, <i>Myblu</i> Device Data, Location Data	<p>a) Consent where we use any special categories of personal data</p> <p>(b) Necessary for our legitimate interests (to ensure device connectivity can be established and to improve user experience)</p>
Providing customer service	Identity Data, Contact Data, Financial Data, Transaction Data	<p>a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to develop our relationship with you to progress our business)</p>
Personalising your blu experience	Identity Data, Contact Data, Transaction Data, Account Profile Data, Communications Data, Technical Data, Usage Data, Third-Party Data, <i>Myblu</i> Device Data, Location Data	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
Providing product reviews and feedback	Identity Data, Contact Data	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to study how our products/services are used, to develop them and grow our business)</p>
Events	Identity Data, Contact Data	Consent
Conducting surveys	Identity Data, Contact Data	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to study how our products/services are used, to develop them and grow our business)</p>

Product Information	Identity Data, Contact Data, Transaction Data, Account Profile Data, Communications Data, Technical Data, Usage Data, Third-Party Data, Myblu Device Data, Location Data	(a) Consent  (b) Necessary for our legitimate interests (to develop and grow our business, understanding customers and to inform our marketing strategy)
Research and analysis	Identity Data, Contact Data, Transaction Data, Account Profile Data, Technical Data, Third-Party Data, Myblu Device Data, Location Data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Administering and protecting our business	Identity Data, Contact Data, Financial Data, Transaction Data, Account Profile Data, Marketing and Communications Data, Technical Data, Usage Data, Third-Party Data, Myblu Device Data, Location Data	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
blu Care	Identity Data, Contact Data and Transaction Data.	(a) Consent  (b) Necessary for our legitimate interests (to develop and grow our business and understanding customers)

### **If you do not provide the personal information**

We need some of your personal information by law, to respond to your enquiries, to enter into a contract with you (for example, to make sure we can deliver the products/services you asked for to you). Without this information, we may not be able to continue with the process that you want us to. We'll explain when this applies where we collect your personal information if it is not clear why we need it.

### **Who we share your personal information with**

We will treat all your personal information as confidential and in accordance with data protection laws. We may, however, need to share your personal information with our affiliates that are part of the Imperial Brands group and with third parties who provide us with services. [\[Read more\]](#)

[We limit the amount of third parties that have access to your personal data to only what is needed to provide the blu Services.

To do so, there are certain categories of processors (i.e. those third parties who process your personal information on our behalf) that have access to your personal information, which include:

- SaaS CRM solutions, including analytics solutions. Location: EU & US.
- Cloud storage providers. Location: EU & US.
- Age-verification solution. Location: EU & US.

- Payment handling solutions. Location: EU.
- Tracking solutions. Location: EU.
- Review tool. Location: EU.
- Data collection tool. Location: EU.
- Analytics solutions. Location: EU & US.
- Fulfilment and delivery of products providers. Location: EU.
- Marketing agencies and similar service providers: Location: UK & EU

Where we use third parties to process your personal information on our behalf, we will always carry out checks to ensure that there are appropriate protections for the safeguarding your personal information. We will also monitor the performance of these third parties (and their approved subcontractors) to ensure that your personal information remains secure.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

We share your personal information with our Imperial Brands affiliate in the UK, which provides us with sales, marketing and customer care services. This is so that we can engage with you in your own language , and can provide you with local customer support.

We also share information (usually Aggregated Data) with our relevant affiliates for business administration and reporting purposes, and for product and services development purposes. For instance, we share statistical customer feedback and survey data with our affiliate responsible for product innovations.

We will not usually disclose your personal information other than as set out above. However, there are certain circumstances where we need to share personal information, for instance:

- where we are legally required to disclose the information, for example because a court orders us to do so;
- where the disclosure of the personal information is required for the purposes of the prevention and detection of crime. This includes sharing the personal information with tax authorities and law enforcement agencies;
- where we need to disclose the personal information for or in connection with any legal proceedings, or for obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- where disclosure is necessary to protect your vital interests (for example if you are unwell at one of our events, we may need to seek medical assistance); and
- where we share your personal information with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets if we reorganise our business. Alternatively, we may seek to acquire other businesses or merge with them.]

### **Cross-border transfers**

Your personal information will only be transferred to countries in the European Economic Area (the “EEA”) or where the recipient has confirmed an adequate level of protection for it, for instance, by contractual agreement. You can ask us about the arrangements we have in place. [\[Read more\]](#)

[In some cases, we work with third parties, including our Imperial Brands affiliates, based outside of the European Economic Area (**EEA**) who store, host or transfer your personal information outside the EEA.

If we transfer your personal information out of the EEA, we will ensure that a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will ensure the countries that we transfer your personal information to have been deemed to provide an adequate level of protection for personal information by the European Commission;
- we will use data processing agreements or specific contracts approved by the European Commission which give personal information the same protection it has in Europe; or
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.]

### **How we look after your personal information**

Information sent via the internet is not always secure. We cannot guarantee the security of the information while it is being transmitted to our website or the *Myblu* app as you register your account; any transmission is at your own risk. However, once we've received it, we take appropriate security measures to keep it safe. [\[Read more\]](#)

[We limit access to your personal information to those who have a business need to know. Where we use service providers, we require them to take appropriate security measures to protect your personal information from accidental or unlawful destruction, loss, or alteration and unauthorised access or disclosure. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We take the security of your data extremely seriously so, to protect your privacy, messages passed between your *Myblu* device and our servers are encrypted. From time to time, we may need to update your device with important performance/security updates. When your *Myblu* device needs a security update, our blu security team will implement the update through the *Myblu* app so that, when you next sync, the update will be applied automatically.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.]

### **How long we hold personal information for**

We keep your personal information for as long as is necessary to fulfil the purposes for which it was collected. After that we will delete or de-identify your personal information unless we hold it to comply with our legal obligations, resolve disputes and enforce our agreements. [\[Read more\]](#)

We will keep any personal information in your account, your *Myblu* device and the *Myblu* app for as long as you have an account with us and generally for a period of 27 months following your last purchase of a product or when you last accessed your account, provided that you are not subscribed to our newsletter.

If you wish to delete your *Myblu* Device Data or if you stop using your *Myblu* device for 1 year, we will hold the personal information for a further 6 months in case you change your mind, after which we will un-pair your *Myblu* device from the *Myblu* app, effectively de-identifying the data generated by your use of the *Myblu* device. This process is not reversible. We will retain this anonymous statistical data for our research and analysis purposes.

We may need to keep your personal information for a longer period under certain limited circumstances (for example, where we have a legal reason to keep the personal information for a longer period or in case of a legal claim or dealing with on-going queries or complaints.)

### **Links to third-party websites**

Our website and the *Myblu* app may include links to third-party websites, plug-ins and applications (such as Facebook and Twitter). Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. We do not control these third-party links and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Your information rights**

If you wish to exercise the rights set out in this section, please make your request in writing using the contact details in the [Who we are and how to contact us](#) section below. We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information we need.

In summary, you have the right, within certain legal parameters, to ask us:

- for details about how we use your personal information;
- to see what personal information we hold about you;
- to correct your personal information;
- to erase your personal information in certain circumstances;
- not to use your personal information in a particular way;
- to port your personal information in a commonly used electronic format;
- to restrict how we use your personal information;
- not to send you product information materials; and
- not be subject to automated decisions about you and to request human intervention.

Sometimes you will be able to exercise your rights through your account settings. We have noted where this is possible in the further information provided below. [\[Read more\]](#)

**[For details about how we use your personal information.** This Privacy Notice tells you this and in any further updates to it;

**To see what personal information we hold about you.** You can access your personal information through your account settings or you can ask us to provide you with it.

**To correct your personal information.** You can ask us to correct inaccurate information that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct it on our systems as soon as possible. You can also update your own personal information at any time through your account settings via the *Myblu* website. The only personal information you cannot change directly through your account settings is your date of birth; you will need to contact us to do this.

**To erase your personal information in certain circumstances.** You can ask us to delete your personal information in certain circumstances (for example, if we have processed your personal information unlawfully or if we no longer need it for the purposes set out in this Privacy Notice). If you ask us to delete your personal information but you do not want to close account, we will usually need to keep processing your data in a personally identifiable form, so you should be aware that we may not be able or obliged to anonymise your personal information. If you ask to delete your account, we will stop using your account but we will retain some details for legal or evidential purposes.

**Not to use your personal information in a particular way.** You can object to us processing any personal information that we process where we are relying on legitimate interests as the legal basis of our processing. If we have compelling legitimate grounds to carry on processing your personal information, we will be able to continue to do so. Otherwise, we will stop processing your personal information.

**To port your personal information in a commonly used electronic format.** You can ask us to send you a copy of the personal information that we hold about you in a commonly used electronic format.

**To restrict how we use your personal information.** You can ask us to restrict processing of your personal information in some circumstances (for example, if you think the personal information is inaccurate and we need to verify its accuracy, or if we no longer need the information but you require us to keep it so that you can exercise your own legal rights). This means that we only store your personal information and we won't carry out any further processing on it unless you give us consent or we need to process the information to exercise a legal claim or to protect a third-party or the public.

**Not to send you product information.** You can ask us not to send you direct communications regarding product information. You can do this by opting out of what you no longer want to receive in the preferences section of your account settings. You can also opt out by using the "unsubscribe" option in any of our emails.

**Not be subject to automated decisions about you and to request human intervention.** You can object to automated decisions being made about you and to request human intervention.]

If you have given us permission to use your personal information in any particular way, you have the right to withdraw that permission at any time. You can do this in the preference centre in your account or by contacting us.

### **Changes to this Privacy Notice**

We will keep this notice up to date and you can find the date it was last updated at the bottom of the page. If there are any changes to the way in which your personal information is used, we will update this privacy notice and, where appropriate, notify you of the changes by email. We recommend that you check this page from time to time to ensure that you are aware of any changes.

### **Who we are and how to contact us**

The data controller of all personal information collected from your use of the blu Services is Fontem Ventures B.V., the blu brand owner, of Radarweg 60, 1043 NT, Amsterdam, The Netherlands (registered number: 56714955).

If you have any queries about this Privacy Notice or complaints about the way we use your personal information, please contact us at [dataprotection@uk.imptob.com](mailto:dataprotection@uk.imptob.com) and we will assist in resolving the issue.

#### *By post:*

Data Protection  
Fontem Ventures B.V.  
Radaweg 60  
1043 NT Amsterdam  
The Netherlands

#### *By email:*

[dataprotection@uk.imptob.com](mailto:dataprotection@uk.imptob.com)

### **Lodging a complaint**

If we cannot resolve your complaint or you are unhappy with how we have processed your personal information, you have a right to complain to the Dutch Autoriteit Persoonsgegevens or the UK's Information Commissioner's Office. You can find out how to do this by visiting <https://autoriteitpersoonsgegevens.nl/en> or [www.ico.org.uk](http://www.ico.org.uk) respectively.

**Effective Date**

This Privacy Notice is effective from 19 December 2019. Previous versions of the Privacy Notice can be found [here](#).