

Privacy Notice

Introduction

blu is taking data protection very seriously. Data collected by blu are managed by Fontem Ventures BV, the blu brand owner, and may be shared with local Imperial Brands PLC Group subsidiary located in your country. blu is collecting different types of data for different purposes, you can find the details below. This Privacy Notice is applicable to all personal data that blu is collecting when you interact with blu. The headquarter of blu is located in Amsterdam, The Netherlands where we process most personal data.

In case you have a question about our Privacy Notice or the usage of your data, please contact our Customer Service [here](#) or contact us via support@blu.co.uk.

Categories & Purpose

blu is processing different categories of personal data, such as (but not limited to):

- Information to deliver your product. In order to deliver the product to you we are collecting your name, email address, address and in some cases your phone number to send you order information. In case you order a blu product, we perform an age-check since we cannot sell to minors.
- Creation of an account. In case you sign up for an account with us, we collect your name, email address, birthday (for age-verification) and email address. You can also choose to sign-up for personalized updates through email. In case you have provided your consent to receive information, news and offers via SMS/Phone direct mailing, we can contact you through those channels.
- bluNation program. When you create an account with blu.com you will be able to redeem your coupon codes and collect points from your online purchases that both can be exchanged for discounts. We will also be using your point activity to personalize the messages that you receive from us. Your points will be tracked with a unique loyalty number each time you make a purchase with the same blu account.
- Personalized updates through email. In case you sign up for personalized (based on your online preferences and behavior on our website) updates through email you will receive emails from us with news, events and offers tailored to your preferences. You can adjust the latter regarding emails in the preference center. You can unsubscribe through a link in every email that we send out.
- Contacting Customer Service. In case you are contacting our Customer Service we are ready to help you with any type of problem you might encounter. In some cases, we will save your contact information to be able to contact you regarding your questions. 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 might be saved in our system to ensure you receive support in the correct way by our Customer Service.
- Leaving a product review. If you leave a review about a blu product on our website, we collect personal data about your experience as a vaper. You can choose what information you would like to provide. The information is being collected to give readers of the review a better understanding of your information.
- Participating in an offline event. In case you participate in an offline event, your data is being collected to better understand your preferences. The event can be held offline, the data is collected by a data collection tool. In some cases. The offline data collection may be part of a promotional initiative.
- Personalizing your shopping experience. Based on your activity on our website and response to our newsletter we personalize your shopping experience and communication towards you to ensure you will see contents that are relevant for you.
- Survey invitations. Occasionally you will receive an invite from us to fill out a questionnaire. You are free to choose if you would like to fill out the questionnaire. The provided information will be used to better understand your preferences and to serve you better.
- Market research & analysis. based on the feedback you provide us, we perform market research and analysis to improve our service to you.

Lawful Basis & Legitimate Interests

The majority of the data is collected to optimize our service to you as a customer. Whenever consent is required (for example for marketing purposes) we collect consent. In some occasions we collect data because we are required to do so by law. For example, when we ask you to upload your ID for age-verification purposes. By checking your age, we are ensuring we are not selling our products to customers under 18. The verification of your ID is being done by an external party and your ID is not saved in their or Fontem Ventures's/blu's system. To improve our services to you we create reports for internal decision making. These reports do not include your personal data.

Recipients

We limit the amount of people that have access to your data to only that what is needed to service you. In order to do so, there are certain categories of processors that have access to the data:

- SaaS CRM solutions, including analytics solutions. Location: EU & US.
- Cloud storage providers. Location: EU & US.
- Age-verification solution. Location: EU.
- Payment handling solution. Location: EU. - Tracking solutions. Location: EU.
- Loyalty program. Location: US.
- Review tool. Location: EU.
- Data collection tool. Location: EU.
- Analytics solutions. Location: EU & US.
- Fulfillment & delivery of products providers. Location: EU.

Please note that your data is not sold to any third parties. In case your data is stored outside of the EEA, appropriate safeguards have been put in place.

Overseas Transfers

In some cases, your personal information will be stored on servers located outside of the EEA. In this case, Fontem Ventures/blu has taken appropriate measures to ensure your data is stored safely. Fontem Ventures is part of Imperial Brands PLC group. In the case Fontem Ventures shares data company wide, and if needed Data Processing Agreements have been put in place. Please note that your data will not be sold to third parties.

Retention

We will store your data in case you are an active customer/newsletter recipient. In case you have not bought a product with us or have not used your account for 27 months and you are not subscribed to our newsletter, we will no longer keep your personal data for commercial purposes. However, you are always welcome to sign-up again! We will keep financial data (including your personal data) for as long as required by law.

Rights

If you would like to adjust your privacy settings, login to your account and go to your personal details. In your account you can update and or modify your data. You can ask us for information about your data and how it is processed. If allowed by law, you can request us to delete your data. In case you would like to know more about this or exercise any of these rights, please contact our Customer Service [here](#) or via support@blu.co.uk.

Personalized shopping

In order to provide you with a personalized shopping experience, we will send you marketing information based on your preferences. These preferences can be based on your online behavior and/or surveys you have participated in. Based on this, personalized emails will be sent out (in case you are subscribed) or personalized advertisements will be shown to you. Based on your online behavior and preferences our website might also be adjusted accordingly. In certain cases, your data might be matched to third-party data to build up a profile. This profile will give us insight on how we can personalize your experience with us. In case you would like to adjust this, you can

adjust your email preferences via the link in every email that we sent or if you login to your account page and go to email settings. You can adjust your cookie settings [here](#).

Age-Verification

As we are ensuring that we follow legal regulations, please be aware that not participating in the age-verification will obstruct your purchase with us. If you have any questions about the age-verification, please contact our Customer Service who is happy to help you with any questions you may have.

Social Media

In case you have a Facebook or Twitter account you can sign up for a blu account using your social media account. Depending on the settings of your social media account, your data will be stored in our systems.

In case you have a social media account at platforms such as Facebook, Twitter or Instagram, you should be familiar with how these platforms share your profile(s)'s personal data and the choices you are able to make regarding your account. blu respects the privacy policies of these third parties. Depending on the choices you have made regarding your privacy settings, certain information might be shared with blu. This might include information on your interests, comments, content you have posted, user name, and other online activities. On the website of each platform you can find information on policies around data sharing of your personal data. We encourage you to read this information and adjust your setting to your personal preferences.

Purchase at a market place

In case you are buying a blu product at a market place, we will receive information about your purchase and personal data with the market place.

Links to Other Websites

The Site may link to other websites which are outside our control, and other websites outside our control may link to the Site. Whilst we try to ensure that we link only to websites which share our privacy and security standards, we and our service providers are not responsible for the terms of use, privacy policies, operation, performance and content of other websites or for the protection of any information which you provide on other websites. You should exercise caution and review the privacy statement applicable to the website in question.

Cookies

The blu website is using cookies to be able to make your experience on our website as pleasant as possible. In case you would like to know more, please go to our Cookie Policy. You will also find more information on how you can adjust your cookie settings.

Please note that this website does not respond to a 'Do Not Track' signal.

Contact us with your questions!

In case you have additional questions about your privacy, you can contact our Customer Service, [here](#) or via support@blu.co.uk.

The contact information/address of Fontem Ventures/blu is:

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The Netherlands