

Privacy Notice

Introduction

John Player & Sons Ltd. takes data protection very seriously. Data collected by us may be shared with other entities who may process data on our behalf. See Recipient List below. We collect different types of data for different purposes and you can find the details below. This Privacy Notice is applicable to all personal data that we collect when you interact with us.

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-ie@blu.com.

Categories & Purpose

We process 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 personalised updates through email. If you have provided your consent to receive information, news and offers via SMS/Phone direct mailing, we can contact you through those channels.
- Personalised updates through email. In case you sign up for personalised (based on your online preferences and behaviour 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 centre. You can unsubscribe through a link in every email that we send to you.
- Contacting Customer Service. In case you are contacting our Customer Service Team 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.
- Personalising your shopping experience. Based on your activity on our website and in response to our newsletter we personalise your shopping experience and communication towards you to ensure you will see content that is 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 or not. 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 optimise our service to you as a customer. Whenever consent is required this is collected... In some occasions we collect data because we are required to do so by law. For example, when we ask you to confirm you are over 18. By checking your age, we are ensuring we are not selling our products to customers under 18o 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.
- Payment handling solution. Location: EU
- Tracking solutions. Location: EU.
- Review tool. Location: EU.
- Data collection tool. Location: EU.
- Analytics solutions. Location: EU & US.
- Fulfilment & 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-ie@blu.com

Personalised shopping

In order to provide you with a personalised shopping experience, we will send you information based on your preferences. These preferences can be based on your online behaviour and/or surveys you have participated in. Based on this, personalised emails will be sent out (in case you are subscribed) Based on your online behaviour 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 personalise your experience with us. You can adjust your email preferences via the link in every email that we send or login to your account page and go to email settings. You can adjust your cookie settings [here](#).

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 the case where you have a social media account on 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 Team [here](#) or email support-ie@blu.com

Our contact information/address is:

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Dublin 12
D12, C9YE
Company
Registration
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