

**Privacy notice for customers and partners of
Zapf Creation (UK) Limited**

At Zapf Creation (UK) Limited, we are committed to protecting and respecting your privacy and safeguarding any personal data that you give to us. We are transparent about the processing of your personal data and this notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Your personal data will be used only for the purposes of a business relationship.

We are a controller under the UK GDPR and the Data Protection Act 2018.

Address:

Zapf Creation (U.K.) Ltd.
Regent Business Park
50 Presley Way
Crownhill, Milton Keynes
Buckinghamshire, MK8 0ES

Contact information:

Telephone: 01908 268480
Email: support@zapf.co.uk

Contact information for data protection and privacy:

kristy@sapphireconsulting.co.uk

What kind of personal data do we collect and process?

If you are applying to become a customer, we will collect, store and process personal data relating to the owners, directors, partners and persons with significant control of the business, such as:

- full name;
- email address;
- home address;
- proof of address;
- proof of identity; and
- other due diligence information as required to on-board the company

We need this data in order to for you to become a customer. Without it, we are unable to have you as customer. We will continue to process personal data to satisfy our due diligence obligations throughout the time that you are our customer.

We need to check that you are using our customer accounts service legally. To do this, we will collect data about you from companies that help us verify identities, do credit checks, prevent fraud or assess risk, as follows:

- **Background check information:** credit report information, identity verification information, background check information from public records and information about any person or corporation with whom you have had, currently have, or may have a financial relationship;
- **Credit, Compliance and Fraud:** information about you from third parties for any credit investigation, credit eligibility, identity or account verification process, fraud detection process, or collection procedure. This includes information from any credit reporting agency or credit bureau and any person or corporation with whom you have had, currently have, or may have had a financial relationship, including places of employment and financial institutions.

We need to do these checks in order to verify the identities of the company owners, directors and persons with significant control to comply with our due diligence obligations.

For all sole traders or partners in unincorporated partnerships we will also collect:

Billing information, including bank account information and payment information.

What is our legal basis for processing?

Purpose	Type of data	Legal basis
<p>To facilitate and enable our relationship with you as a prospective, new or existing customer</p> <p>To provide the customer account that you have requested</p>	<ul style="list-style-type: none"> • full name; • email address; • home address; • proof of address; • proof of identity; and • other due diligence information as required to on-board the company <p><i>Required for all owners, directors and persons with significant control of the company</i></p>	<p>Performance of a contract</p> <p>Necessary to comply with a legal obligation</p>

To process your account information, including manage payments, fees and charges	Name, contact details and account details <i>For all sole traders or partners in unincorporated partnerships</i>	Performance of a contract with you
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Who do we share your personal data with?

We share your personal data with third parties who:

- help us provide our services (e.g., vendors who help us with fraud prevention, identity verification, credit checks and fee collection services) as well as sales representatives, financial institutions, website hosting, data analysis, IT and related infrastructure, communications and auditing;
- help us with the delivery of ordered goods (warehouse and transport service providers, MGA Entertainment (H.K.) Limited, Hong Kong, for FOB/DDP order processing);
- assist us with running our business, complying with our legal obligations and defending our rights (e.g. consultants, accountants and lawyers).

We will share your personal data with third parties who assist us with fraud prevention and identify verification. We will also respond to requests from courts, law enforcement agencies, regulatory agencies, and other government authorities.

We will share your personal data with third parties in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock.

When a third-party entity processes your personal data on our behalf, we have a data sharing agreement with them that sets out their obligations under data protection law.

How long do we retain your personal data?

We retain your personal data in an identifiable format for the least amount of time necessary to fulfil our legal or regulatory obligations and for our business purposes. Data are retained for the following periods of time:

Type of data	Purpose	Retention period
Identity and fraud check information Contact details	Providing a customer account Identity and fraud checks of new customers On-going customer due diligence	5 years after termination of the contract, or from the last contact, as applicable
Contact details for marketing purposes	Customer relationships and experiences	1 year after termination of the contract
Bank details	For sole traders and partners in unincorporated partnerships	7 years after termination of the contract
The customer account agreement	Providing a customer account	7 years after the date your signed customer account agreement ends

What security procedures do we use?

We have procedures in place to prevent unauthorised access to, and the misuse of, personal data.

We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorised personnel are permitted to access personal data in the course of their work.

Do we transfer data out of the UK?

Our head office is in Germany and customer data is transferred there for administrative purposes. This is a legitimate interest for us as an international business.

Your personal data are in part transferred to MGA Entertainment (H.K.) Limited in Hong Kong for order processing. We use the UK's International Data Transfer Agreement in these cases.

Do we use any automated decision making?

We don't do any automated decision making.

What are your rights regarding your personal data?

You have the right:

- To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- To rectify incorrect personal data that we are processing.
- To request that we erase your personal data if:
 - we no longer need it;
 - if we are processing your personal data by consent and you withdraw that consent;
 - if we no longer have a legitimate ground to process your personal data; or
 - we are processing your personal data unlawfully
- To object to our processing if it is by legitimate interest.
- To restrict our processing if it was by legitimate interest.
- To request that your personal data be transferred from us to another company if we were processing

If you have a concern about the way we are collecting or using your personal data or wish to exercise any of your rights, please contacting kristy@sapphireconsulting.co.uk. You can also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.