

<b>Date of Last Review:</b>	January 2026
<b>Approval Authority:</b>	Director
<b>Review Frequency</b>	Annually
<b>Location:</b>	Internal File Storage System
<b>Date of Next Review:</b>	January 2027

## Overview

Christmas Creations data protection and privacy measures are governed by:

- i. the General Data Protection Regulation ((EU) 2016/679) ("GDPR") and any national implementing laws, regulations and secondary legislation, in the UK and then;
- ii. any successor legislation to the GDPR or the Data Protection Act 1998 ("Data Protection Legislation").

This policy sets out how Christmas Creations uses and protects any information provided to Christmas Creations (including information provided through the company website [www.Christmas-Creations.com](http://www.Christmas-Creations.com) or other websites through which Christmas Creations provides its services to. As such Christmas Creations may process personal data of its customers, contacts and visitors to its website.

## Personal Data and Basis for Collection

For the purpose of Data Protection Legislation, where personal data is provided directly to Christmas Creations through use of the website, email, or other means; Christmas Creations will be a data controller (as defined in the Data Protection Legislation) of such information.

Where Christmas Creations is provided with information only for the purpose of performing a contract or where Christmas Creations cannot determine the use of such information, Christmas Creations will be data processor (as defined in the Data Protection Legislation) of such information.

Christmas Creations may collect, use, store and transfer different kinds of personal data which Christmas Creations have grouped together as follows:

- Identity Data including names, username or similar identifier, title, job title, directorships.
- Contact Data including billing address, delivery address, email address and telephone numbers.
- Financial Data including bank accounts.
- Transaction Data including details about payments to and from companies or individuals and other details of products and services they have purchased from Christmas Creations.
- Usage Data including information about how Christmas Creations is used or submit an enquiry or query through the Websites.
- Marketing and Communications including preferences in receiving marketing or surveys from us and our third parties and any communication preferences.
- Additional Information including further information companies or individuals chose to provide to us.

Unless Christmas Creations is provided with such information to customise the service we may provide, Christmas Creations does not process any Special Categories of Personal Data about companies or individuals (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data). Nor does Christmas Creations collect any information about criminal convictions and offences.

## Failure to provide personal data

Where personal data is not provided when requested, Christmas Creations may not be able to perform the contract it has or is trying to enter into. In this case, Christmas Creations may have to cancel the services but we will notify any companies or individuals if this is the case at the time.

## How is personal data collected?

Christmas Creations use different methods to collect personal data from and about companies or individuals including through:

- Direct interactions. Companies or individuals may give us their Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data provided when companies or individuals:
  - Apply for the Products or Services
  - Give us some feedback or complete a survey
  - Request marketing data to be sent
  - Create an account on our website

## Purposes for which Christmas Creations will use personal data

Set out below is a description of all the ways we plan to use companies' or individuals' personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process personal data for more than one lawful ground depending on the specific purpose for which we are using the data. Interested parties should contact info@christmas-creations.com for details about the specific legal basis we are relying on to process personal data.

Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
To register a new customer or member and verify their identity when using log-ins.	(a) Identity (b) Contact	Performance of a contract
To process and deliver the Services including: (a) Managing payments and charges (b) Collecting and recovering money owed to us (c) Contacting companies or individuals and corresponding about the Services (d) to provide support to the services	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)
To respond to queries and enquiries	(a) Identity (b) Contact	Legitimate interests (to offer similar services or offers)
To undertake any marketing	(a) Identity (b) Contact	Legitimate interests (to offer similar services or offers)
Business Performance – To manage our business performance and assess client satisfaction and improvement to our Services	(a) Identity Data (b) Individual Data	Legitimate interests (to improve the services we provide)
Events – To enable us to provide events which take into consideration client preferences	(a) Identity Data (b) Individual Data (c) Event Data	Legitimate interests (to tailor events) Consent

## Change of purpose

Christmas Creations will only use personal data for the purposes for which it was collected for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If

companies or individuals wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, they should contact: info@christmas-creations.com.

If we need to use companies' or individuals' personal data for an unrelated purpose, we will notify them and we will explain the legal basis which allows us to do so. Please note that we may process companies' or individuals' personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How personal data may be shared

Personal data that Christmas Creations collects in accordance with this Privacy Policy, may be shared as follows:

- With other international Christmas Creations member organisations.
- Where information is shared through public platforms in accordance with the provision of the services
- With marketplaces such as Amazon.
- Where Christmas Creations is under a duty to disclose personal data to comply with any legal obligation, or to enforce or apply Christmas Creations terms and conditions and other agreements.
- With third party debt recovery agencies.
- To protect the rights, property, or safety of Christmas Creations and its customers, or others. This includes exchanging information with other companies, individuals and organisations for the purposes of fraud protection and for compliance with laws.
- With third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

## How Christmas Creations stores personal data

For secure storage, Christmas Creations ensures that it stores personal data within the UK.

Christmas Creations may share companies' or individuals' personal data with some third parties who are based outside the EEA. In this case, Christmas Creations will ensure that the appropriate security measures and processing provisions are in place to protect that personal data.

## Data security

Christmas have put in place appropriate security measures to prevent companies' or individuals' personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

## Personal Data Retention

We will only retain companies' or individuals' personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Generally, we keep personal data in accordance with our internal retention procedures, which are determined in accordance with our regulatory obligations and good practice. These retention periods depend on the nature of the information, and are subject to change. If companies or individuals have any questions in this regard, they should contact us at info@christmas-creations.com.

## Companies' or Individuals' Rights

# GDPR Policy

Chestnut Barn, Blackbirds Farm, Blackbirds Lane, Aldenham, WD25 8BS

www.christmas-creations.com • info@christmas-creations.com • t: 0203 411 1991 • f: 0203 411 1992



Under certain circumstances, companies' or individuals' have rights under Data Protection Legislation in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

To exercise any of the above rights, companies or individuals should email their request to: info@christmas-creations.com. Where companies or individuals exercise their right to erasure or where information is deleted in accordance with Christmas Creations retention policy, please note that after the deletion of their personal data, it cannot be recovered, so if they require a copy of this personal data, please request this during the period Christmas Creations retains the data.

## Complaints

If companies or individuals would like to make a complaint in relation to how Christmas Creations may have stored, used or processed their personal data, they have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). Christmas Creations would, however, appreciate the chance to deal with the concerns before they approach the ICO so please contact us in the first instance.

## Changes to this Privacy policy and the duty to inform us of changes

As and when necessary, changes to this privacy policy we will posted here. Where changes are significant, we may also email all our registered users with the new details, and where required by law, will we obtain consent to these changes.

It is important that the personal data we hold about companies' or individuals' is accurate and current. We ask that they keep us informed if their personal data changes during the relationship with us.

## Questions and Contact information

For any questions or for further information, please contact: info@christmas-creations.com

The Director with overall responsibility for the implementation of this policy is Mr Alex Walters.

Signed:

Date: 21/01/26

Mr Alex Walters

Director