

# Privacy & Cookies Policy

AFFINION INTERNATIONAL LIMITED COMPANY PRIVACY AND COOKIES POLICY

The Privacy and Cookies Policy sets out how we use any personal information that you give to us, or that we may collect or otherwise process in the course of providing services to you.

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**1. Who We Are and About this Privacy and Cookies Policy**

This document sets out the Privacy and Cookies Policy of Affinion International Limited, (“we”, “us”, “our” or “Affinion International Limited”) in relation to the provision of all our consumer services and our websites. These include any services that you enrol in or otherwise subscribe to and your correspondence with us from time to time in relation to these, whether this be:

- online through our service specific and other company websites;
- via the telephone when you call our customer service teams;
- when you subscribe or communicate with us in writing by email or post;
- when we co-ordinate with other institutions in order to provide the relevant services to you (for example insurance underwriters, credit card providers and your bank).

This document explains how we use and process your personal information (meaning any information about you which is personally identifiable or can be related back to you like your name, date of birth, credit or debit card numbers, address, telephone number, email address, preferences, service selections and queries and is generally referred to throughout this policy as “your information”).

**2. How We Collect and Use Your Personal Information**

**2.1 General**

When you subscribe to any of our services and/or communicate with us about these, you may be asked to provide your information in order to:

- authenticate your identity;
- register you to receive the relevant services including co-ordinating with other partners in order to do so and to provide such services;
- allow us to improve our services to you or to develop new services;
- provide you with marketing materials, but only where you have indicated your consent to this (see below for details);
- process any query or complaint;
- respond to a survey or update your information.

By providing such personal information, you fully understand and consent to the collection and processing of such information.

We may record or monitor calls made by you to our customer service desks for quality assurance and training purposes. However, we will always inform you if such recording or monitoring is taking place.

**2.2 Information Sharing, Marketing and Disclosure**

We may co-ordinate with third parties in the provision of your selected services to you (for example your bank, insurance underwriters and credit providers). From time to time we may ask your card issuer to update us with any changes to the information they have provided to us, for example, by providing us with any updated or new card numbers or expiry dates.

In addition, and with your consent, we (and if applicable, our partners or other trusted third parties) may use your information for certain marketing activities. It is up to you whether we use your information in this way.

Our consent notices provided to you when you subscribe for any of our services will generally ask for your permission to send you marketing communications. Such consents relate to:

- communications with you from time to time by email and (where you provide us with those details either via the website(s) or elsewhere) by mobile (using SMS or, if your mobile device permits, EMS or MMS messages or similar technologies) and occasionally by post, with information, offers and other material from Affinion International Limited or any of its affiliates which may interest you;

- making your information available from time to time to trusted partners and third parties, for them to communicate with you about their products and services as per above.

We may also use your information to conduct market research, for example to ask you to participate in a survey about topical issues, conducted by us or trusted partners or third parties. We will always try to tell you before you participate in the survey how any information you provide in the survey will be used.

Sometimes we may enable third parties acting on our behalf to analyse your information, in a non-personal identifying form, (generally in the form of statistics), so that we can identify trends about usage of our website(s) or services and improve them.

We may disclose your information to the marketing partner that provided you with details of our offer to enable them to track the offer that you accepted from us. Data shared with the marketing partner may include name, mailing address and/or the status of your membership. We may also request non-personally identifiable information from you, such as annual income, buying preferences, or your age, also known as demographic and profile data, though this information is optional.

We may use this data to improve and enhance your experience on the Affinion International Limited websites. We may also share this information with others, such as advertisers interested in advertising on the Affinion International Limited websites, in aggregate, anonymous form, which means that the shared information will not contain nor be linked to any personally identifiable information about you or any other person.

Additionally we reserve the right to access and disclose your information in order to comply with applicable laws, to comply with lawful requests from governments, law enforcement agencies or parties whose request we reasonably consider to be justified in connection with any allegations by any party about your abuse of our services, to operate our systems properly or to protect ourselves or our users.

**3. Automatic Information**

Please note that this section is only relevant in relation to information that we may collect and process in connection with your use of the Credit Manager website.

**3.1 Cookies**

A cookie identifies your computer to a server that then enables information to be stored on the hard drive of your computer. Cookies allow a computer to be identified as corresponding to one that has accessed another website or visited a website previously. Cookies are commonly used on the Internet and do not harm your computer system.

We only use strictly necessary cookies – these cookies are essential, as they enable you to move around our website and use its features. Without these cookies, services you’ve asked for (such as completing an application form) can’t be provided. These cookies don’t gather information about you that could be used for marketing or remembering where you’ve been on the internet.

We are continually looking to adopt and implement new practices and technologies in order that we may improve your user experience. We may update this Cookies Policy from time to time with details of new cookies.

Details of the cookies we currently use on the Credit Manager website are shown below:-

Cookie	Name	Purpose	More Information
Strictly necessary cookies	ASP.NET_SessionId	Essential session tracking	Visit the Microsoft website for more information - microsoft.com
	hasCookies	Determines whether or not the user allows first party cookies in their browser.	If a web browser can not accept first party cookies it will not be possible to use our websites
	Visitor	Essential session tracking	A unique reference assigned to each visitor to help improve their experience using our website. Short expiry
	sis	Essential session tracking	A unique reference assigned to each visitor to help improve their experience using our website. Short expiry
	visitorid	Essential session tracking	A unique reference assigned to each visitor to help improve their experience using our website. Short expiry

**How to stop cookies**

You can stop cookies from being deployed on your computer by configuring your browser not to accept them or opt-out. Please refer to your browser’s ‘help’ facility.

If cookies are already on your system, you can delete them - For more information on cookies and deletion of cookies please visit: <http://www.allaboutcookies.org/managecookies/>. Please be aware that restricting or deleting certain cookies can result in difficulties when navigating around websites.

Third party websites using cookies

Our websites may contain links to third party websites some of which may also use cookies. This Privacy and Cookies Policy does not cover third party websites which will be subject to their own privacy and cookies policies. Affinon International Limited does not have access to or control over cookies or other features used by such sites. Please contact them directly for more information about their privacy practices.

### 3.2 Internet Protocol (IP) Address

Where you are using our websites, we may use your IP address to help diagnose problems with our server and to administer our website. Your IP address may also be used to help identify you for the duration of a session and to gather broad demographic information. Your IP address will never be linked to any personally identifiable information unless you are in the process of making a purchase, in which case the link between this information will terminate upon your final purchase.

### 3.3 Clickstream

As you use the Internet, a trail of electronic information is left at each web site you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server.

Clickstream data can tell us the type of computer and browsing software you use, the address of the web site from which you linked to an Affinon International Limited website, and, in some instances, your e-mail address. We may use clickstream data to determine how much time visitors spend on each page of our site, how visitors navigate throughout the site and how we may tailor our web pages to better meet the needs of visitors. This information will only be used to improve the Affinon International Limited web sites. Any collection or use of clickstream data will be anonymous and aggregated and will not contain any personal information except where you have selected an email address that identifies your name.

## 4. Unsubscribing/Amending your information

You can update and correct your information held by us by sending an email to [enquiries@creditmanager.barclays.co.uk](mailto:enquiries@creditmanager.barclays.co.uk) or writing to Affinon International Limited, Charter Court, 50 Windsor Road, Slough, Berkshire, SL1 2EJ or by calling 0800 432 0912.

You can remove your information from our marketing database entirely by emailing, writing or calling us using the contact details above, specifying your name, the email or other address/ telephone number you used to register with us and, if referring to a web registration, your user name in the email.

If you only want to remove your information from marketing communications in relation to a specific service simply email, write to us or call us using the above contact details with the information above and the name of the service.

Alternatively, whenever we contact you, (for example to send you an email newsletter which you have requested) you will normally find an email or other address at the bottom of the email, which you can use to tell us if you no longer wish to receive the newsletter or other communication in question.

## 5. Security

Securing your personal and non-personal information is very important to us. All customer databases are held in a secure environment and (except for law enforcement authorities in limited circumstances), only those Affinon International Limited employees or other persons who need access to your information in order to perform their duties are allowed such access. Any of these employees or persons who violates our privacy and/or security policies may be subject to disciplinary action, including possible termination and civil and/or criminal prosecution.

Where you are using our websites, we attempt to provide for the secure transmission of your information from your computer to our servers by utilising encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Affinon International Limited, and Affinon International Limited and you, will be free from unauthorised access by third parties, such as hackers.

Our websites utilise Standard SSL encryption on pages where secure information is transmitted over the Internet. We also use Verisign as our Certificate of Authority. If you would like more information on our Verisign Certificate, click on the seal below.

## 6. Business Transfers

In the unlikely event that we sell or otherwise dispose of some or all of our business to another party, we reserve the right to transfer your information as part of any assets sold or disposed of.

## 7. Transfers Overseas

Your information may be transferred outside of the European Economic Area for processing. Affinon International Limited's affiliate companies in the United States to which your information may be transferred are part of the US Safe Harbour. For more details on this you can see the Information Commissioner's site at: [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)

Any transfer of your data is done in circumstances ensuring that your data is processed only in accordance with this Privacy and Cookies Policy and the UK's Data Protection legislation. By registering on this site and consenting to these terms, you are consenting to this transfer.

## 8. Other Sites

Our web sites may contain links to other websites. Other web sites may also reference or link to the Affinon International websites. Affinon International Limited is not responsible for their privacy practices or the content of such other sites.

## 9. Your Acceptance of this Policy

In providing personal information to us or using our web sites you signify your assent to our Privacy and Cookies Policy. If you do not agree to this policy, please do not use Affinon International Limited websites or provide your data to us. This Privacy and Cookies Policy supersedes all privacy policies and other similar standards previously issued by us. Since the privacy standards set forth herein are subject to updates and other changes from time to time, please note that this Privacy and Cookies Policy is subject to change at any time. In the event of any such changes, we will notify all of our members and other customers of such changes in the manner to the extent required by law. Your continued use of our site and services following the posting of changes to these terms means you accept these changes.

This policy was last updated 4th October 2012.