

# Protecting your privacy

John Lewis Partnership

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# 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how the John Lewis Partnership uses your data.

For example, we will explain things such as our credit checking procedure and how we combine data across the John Lewis Partnership to build a picture of you.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

Our products and services are aimed at those aged 16 and over

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes via email, but you're welcome to come back and check it whenever you wish.

**When you are using the John Lewis websites, John Lewis Plc is the data controller.**

**John Lewis is a UK based company and therefore, when visiting our website, personal data that we may collect through cookies or online forms will leave the EU for the UK.**

## 2. What is The John Lewis Partnership?

The John Lewis Partnership – which we'll refer to as 'the Partnership' in this document – is made up of a number of related businesses:

- **John Lewis plc** – including **John Lewis Money** (provided by selected partners), John Lewis The Gift List, Home Solutions, my John Lewis loyalty, Joint Loyalty and John Lewis for Business.

You can find out more about how John Lewis Money handles your personal data in section 14.

- **Waitrose Ltd** – including myWaitrose loyalty, Waitrose Groceries, Waitrose Garden, Waitrose Florist, Waitrose Cellar, Waitrose Gifts, Cook Well from Waitrose, Waitrose Cookery School, Leckford Estate (The Waitrose Farm).

- **John Lewis International** – if you're based outside the UK and order from us, you will be trading with John Lewis International.

This Privacy Notice applies to international orders, however there are additional terms for certain countries which supplement this notice and take priority over any conflicting provisions. You'll find more information in section 16.

For simplicity throughout this notice, 'we' and 'us' means the Partnership and its brands.

### 3. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### **Consent**

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.

#### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting the Partnership to law enforcement .

#### **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or develop new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

We may contact you regarding market research

We will also send you direct marketing emails when you shop with us and do not choose to opt out - this is often called a 'soft opt in'

With your consent, or when you shop with us and do not choose to opt out from receiving our emails ('soft opt in') we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone and through our contact centres about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. This is only applicable in the UK.

## **4. When do we collect your personal data?**

- When you visit any of our websites, and use your account to buy products and services, or redeem vouchers from the Partnership on the phone, in a shop or online.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you create an account with us.
- When you purchase a product or service in store or by phone but don't have (or don't use) an account.
- When you engage with us on social media.
- When you download or install one of our apps.
- When you shop online, we capture information through cookies and similar technologies, you can manage these when you visit our site
- When you join a Partnership loyalty programme (e.g. my John Lewis or

myWaitrose) or joint loyalty membership

- When you purchase Foreign Currency from us we'll collect personal information, such as your name, address and proof of identity.
- When you sign up to my John Lewis you will be given access to an area called Kitchen Drawer. This will collect and store all of your receipts, guarantees and warranties for you when you make a purchase from John Lewis & Partners shops and johnlewis.com.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our Partners to email you information about a product or service.
- When you enter prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event, for example a class at Waitrose Cookery School.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services.
- Any individual may access personal data related to them, including opinions. So if your comment or review includes information about the Partner who provided that service, it may be passed on to them if requested.
- When you fill in any forms. For example, if an accident happens in store, a Partner may collect your personal data.
- When you've given a third party permission to share with us the information they hold about you.
- When our John Lewis Money suppliers and partners – e.g. HSBC or RSA – share information with us about the product you have purchased.
- We collect data from publicly available sources when you have given your consent to share information or where the information is made public as a matter of law
- Contains HM Land Registry data © Crown copyright and database right 2021. This data is licensed under the Open Government Licence v3.0.
- When you use our car parks and shops which usually have CCTV systems operated for the security of both customers and Partners. These systems may record your image during your visit.
- When signing up to a product user testing trial.

## **5. What sort of personal data do we collect?**

- If you have a web account with us: your name, gender, date of birth,

billing/delivery address, orders and receipts, email and telephone number. For your security, we'll also keep an encrypted record of your login password.

- Details of your interactions with us through contact centres, in store, online or by using one of our apps.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, gift list and wish list choices, voucher redemptions, brands you show interest in, web pages you visit and how and when you contact us.

- Any items you may have added to your Wish List
- Copies of documents you provide to prove your age or identity where the law requires this. (including your passport and driver's license). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Details of your shopping preferences.

For example, which of our shops you prefer to visit and where you redeem your vouchers.

- Details of your visits to our websites or apps, and which site you came from to ours.
- Information gathered by the use of cookies in your web browser. Learn more about [how we use cookies and similar technologies](#).
- Open rates, click through rates on email marketing campaigns through the use of Pixels.
- Personal details which help us to recommend items of interest.

For example, you might tell us your clothing size, which we'll use to guide our suggested items. Or you might share information on your skin type which allows us to recommend appropriate beauty brands when you use our beauty tool

We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us.

- Payment card information.

- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit a shop or car park. We may also record audio when body worn video is in use.
- Your car number plate may be recorded at some of our car parks to manage parking restrictions.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.
- When part of a user trial, to ensure you are sent relevant & appropriate products we may ask for vital statistics & details on your household.

## 6. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. In the case of loyalty scheme members, we'll also offer you relevant rewards.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

**Here's how we'll use your personal data and why:**

- To process any orders that you make by using our websites, apps or in store. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To send you email notifications when you place a product in your basket and you abandon your browsing before completing your checkout. We do this based on our legitimate interest. To provide you with tracking information so that you can follow your order. We do this under legitimate interest to enhance your customer experience and give you more information around where your delivery is and when your order will arrive.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.

For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations.

- We do not collect, store or share the data that ARKit, TrueDepth API, or other augmented reality (AR) software, uses in our apps. We use your device's TrueDepth camera system to track facial movement, and apply imagery to your face. To use these features, we need access to your device's camera. You can turn camera access on or off at any time in your device's settings.



We only use the camera images and depth data we get from Apple's APIs to apply imagery to your face. We never store this data locally or remotely, or share it with third parties. This data will never leave your device.

- To protect our customers, premises, assets and Partners from crime, we operate CCTV systems in our stores and car parks which may record images for security. We may also record audio where body worn video is in use. At our self-checkout areas we use screens which display live images of the customer using the checkout to help prevent crime in those areas. Our CCTV systems do not use facial recognition nor do they collect biometrics; they are also not connected to other systems containing personal data. We operate these systems on the basis of our legitimate business interests.
- We manage our car parks in conjunction with [Britannia Parking](#).
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, web, text, telephone and through our contact centres** about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. This is only applicable within the UK.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant, personalised communications **by post** in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we

- would be unable to comply with our legal obligations.
- We will share your email address and information related to your use of the website with Meta to analyse the effectiveness of our advertising with them. This is based on consent to advertising cookies. You can opt out of Meta's use of data through Meta platforms. For information on how you can change which cookies you have consented to, please see our cookie notice.
  - We will share your email address and information related to your use of the website with Google to analyse the effectiveness of our advertising with them. This is based on consent to advertising cookies. You can opt out of Google's use of data through Google platforms. For information on how you can change which cookies you have consented to, please see our cookie notice.
  - To display the most interesting content to you on our websites or apps, we'll use data we hold about your favourite brands or products and so on. We do so on the basis of your consent to receive app notifications and / or for our website to place cookies or similar technology on your device. If not through the use of cookies or similar technology, then on the basis of our legitimate interest.

For example, we might display a list of items you've recently looked at, or offer you recommendations based on your purchase history and any other data you've shared with us.

- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

For example, we'll record your browser's Session ID to help us understand more when you leave us online feedback about any problems you're having.

- To comply with our contractual or legal obligations to share data with law enforcement. For example, when a court order is submitted to share data with law enforcement agencies or a court of law
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

- To build a rich picture of who you are and what you like, and to inform our business decisions, we'll combine data captured from across the Partnership, third parties and data from publicly-available lists as we have described in the section What Sort of Personal Data do we collect? We'll do this on the basis of our legitimate business interest.

For example, by combining this data, this will help us personalise your experience and decide which inspiration or content to share with you. We also use anonymised data from customer purchase histories to identify trends in different areas of the country. This may then guide which products we display in particular stores.

- For my John Lewis or joint loyalty members to decide which information to show you, with the help of computer algorithms. We do so on the basis of your consent when you become a my John Lewis member. If you don't want to continue receiving my John Lewis offers, you'll be unable to continue your my John Lewis or joint loyalty membership.

For example, if you consent through our apps, we may use your shopping preferences to offer you tailored rewards.

- To process your booking/appointment requests (such as with a personal stylist). Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.
- For myWaitrose or joint loyalty cardholders to provide you with tailored offers, printed with your till receipt at the end of a shopping trip. These are based on an analysis of previous purchases using your myWaitrose card, including the items you've just bought. We do this on the basis of our legitimate interest to show you relevant offers. Of course, you're free to choose whether to take advantage of them.
- To ensure that all of your purchases are correctly assigned to you we track your payment card token id, this is an id given to your debit or credit card by the banking industry we do this whether you have logged into your account or check out as a guest. We do this for a number of reasons and on the basis of our legitimate interest.

For example, to ensure your purchases show on your account or your points are recorded correctly for the partnership card.

- Help inform business decisions for example which 3rd Party websites we partner with to ensure our advertising reaches our customers
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests

Across the John Lewis Partnership, we record your interactions with us e.g. looking at how often you might shop with us or how much you spend. We do this to create a profile on how you interact with the Partnership and, in turn, that can affect how we engage you. For example, if you shop with us regularly, then this can affect what offers and rewards you might receive from us. We rely on our legitimate interest to undertake this activity.

When you shop at one of our stores or online and use your loyalty card and/or payment card, including a Partnership card, we consolidate your purchases using the unique numbers of your loyalty card and/or tokenised payment card. A loyalty card is unique to you and has a number associated to you which allows us to match it to your profile and therefore any associated spend. Your payment card also has a unique tokenised reference number and we associate this with you when you have used this payment card, also with any spend.

We do this to ensure we have a clear view of what you like and to ensure that you are rewarded appropriately, so that direct marketing or browsing on our websites is tailored to what your preferences. This also allows your receipts to be stored in your kitchen drawer on your online account, if you have one, even if you are shopping in our store. We may also use the information we collect via the consolidation of your spend to inform our business decisions. This is done either by anonymising your spend and analysing it as part of a "spend-trend", statistical view, or working with our third party suppliers, such as Google.

When you purchase a product from us that is delivered by the manufacturer or supplier of said product, we will pass on your contact details so that they can deliver your purchased product. The same with regard to warranties provided by the manufacturer or supplier of the product you bought. For example, if you buy a washing machine from us we will pass your details to the supplier of the washing machine to ensure the delivery of the goods and to fulfil any supplier product guarantees. We do that to ensure that we fulfil our contractual obligations to you.

If the manufacturers or suppliers wish to pass your details to other third parties, or use it for other purposes, they must provide you with sufficient information about whom they share your personal data with, and for what purposes

they intend to use it, and in some cases they may be required to ask for your consent to do so. If they do not provide you with that information or collect your consent, and you are worried that they may have shared your personal data with someone else, you are entitled to contact them directly for clarification.

If you have purchased an Added Care product from John Lewis prior to 31st March 2020, we will have shared your personal data and details of the item you purchased with The Warranty Group who manage all aspects of our Added Care products. They may contact you for issues related to the fulfilment of a guarantee or warranty. For all queries regarding how the Added Care protection is managed by The Warranty Group please refer to the page [here](#).

When you purchase a Protect Plus policy from John Lewis from 18th May 2020 we will share your personal data and the details of the item that you have purchased with Domestic & General Insurance PLC who are the providers of the policy and manage all aspects of the Protect Plus scheme. They will use the information shared with them to contact you regarding the fulfilment of the policy and in order to administer the policy and/or offer you an extension or notification when your policy term is due to end. When you apply for a Protect Plus policy, your data will be used by Domestic & General Insurance PLC under the terms of their own separate privacy policy which is available [here](#). For all queries regarding Protect Plus and how this is managed, please refer to the page [here](#).

When you use our trade in services from 17th July 2023 we will share your personal data and the details and details of the trade in device and new device purchased with Likewize Services UK Limited who are the providers of the Trade-in service and manage all aspects of the scheme. They will use the information shared with them to contact you and in order to administer the scheme and make payments to you. Your data will be used by Likewize Services UK Limited under the terms of their own separate privacy policy which is available [here](#). For all queries regarding Trade-in and how this is managed, please refer to the page [here](#).

When you sign up to the myWaitrose and Vitality reward scheme we will share your information with Vitality along with transactions relevant to the scheme, this is to ensure you are rewarded correctly.

## **7. Combining your data for personalised direct marketing**

We want to bring you offers and promotions that are most relevant to your interests

at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across the Partnership as described above, for example your shopping history at both John Lewis and Waitrose. For this purpose we also combine the data that we collect directly from you with data that we obtain from third parties to whom you have given your consent to pass that data onto us – such as the Land Registry mentioned above.

## **8. How we protect your personal data**

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured and encrypted to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

## **9. How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

### **Some examples of customer data retention periods:**

#### **Orders**

When you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations. In the case of certain products, such as electrical and nursery items, we'll keep the data for 10.5 years.

*When you purchase Foreign Currency from us we'll retain any personal information you provide us, for up to seven years in line with Regulations.*

#### **Warranties**

If your order included a warranty, the associated personal data will be kept until the

end of the warranty period.

#### Foreign currency

When you purchase foreign currency from us we'll retain any personal information you provide for up to 7 years in line with Regulations.

## 10. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

### **Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

### **Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers to contact you about your order delivery & occasionally service review messages
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our [Cookies Notice](#) for details.
- Data insight companies to ensure your details are up to date and accurate.

## Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

For example, if you enter a holiday competition and tick a box agreeing that the travel company can send you promotional information directly. Or if we run a joint event with a restaurant, and you agree to receive direct communications from them.

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell the Partnership and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer.

To help personalise your journey through Partnership websites we currently use the following companies who will process your personal data as part of their contracts with us:

- CACI
- Monetate
- BazaarVoice
- BlueKai
- Adobe Dynamic Tag Management
- RichRelevance
- Adobe Scene7
- New Relic
- Ensignten
- Tapad
- TagMan
- Infectious Media
- SessionCam
- Visual IQ
- AppNexus
- IRI
- BidSwitch
- Quadrangle
- Maru/edr



- ABA
- Verve
- Rubicon
- Doubleclick
- Adobe Analytics
- Maru/edr
- Google
- Twitter
- Instagram
- YouTube
- Cablato
- AWIN (Affiliate Window)
- Yahoo
- Pinterest
- Dressipi
- Facebook
- Meta
- Salesforce
- Wincanton
- Yodel
- Deliveroo
- Stuart Delivery
- Kount
- Tokenex
- Basis Research
- Vitality
- Sopost
- Trustpilot
- Branch
- Auth0
- Swogo
- Creation
- Clearpay

## 11. Where your personal data may be processed

The Partnership is a UK based company and so we will transfer your data to the UK, which is outside of the EU. We may also need to share your personal data with third parties and suppliers outside the European Economic Area (EEA)

### Protecting your data outside the UK

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the UK.

For example, this might be required in order to fulfil your order, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed in the UK. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## 12. What are your rights over your personal data?

### An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- The deletion of the data we hold about you, in specific circumstances. For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (e.g. the end of a warranty).
  - A computer file in a common format (e.g. CSV or similar) containing the personal data that you have previously provided to us and the right to have your information transferred to another entity where this is technically possible.
- Restriction of the use of your personal data, in specific circumstances, generally whilst we are deciding on an objection you have made.
- That we stop processing your personal data, in specific circumstances. For example, when you have withdrawn consent, or object for reasons related to your individual circumstances.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by a Partner of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time by completing an [online form](#).

If we choose not to action your request we will explain to you the reasons for our refusal.

### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data, such as administration of an extended warranty.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **13. How can you stop the use of your personal data for direct marketing?**

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.
- If you have an account, log in into your John Lewis or Waitrose account, visit the 'My Account' area and change your preferences.
- In our apps, you can manage your preferences and opt out from one or all of the different push notifications by selecting or deselecting the relevant options in the 'Settings' section.
- Write to **Data Rights Team - DPO, 171 Victoria Street, London, SW1E 5NN.**

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## **14. John Lewis Money**

### **14.1. How we use your personal data**

When you purchase a product or service from John Lewis Money, we might receive a copy of the information you supplied. If you agree to receive marketing communications from us, we will use your data to personalise what we send you. You are free to opt out of receiving marketing communications from us at any time.

Find out more about the use of your data for marketing in section 7

## **14.2. How our providers use your personal data**

When you then apply for a product or service from one of our chosen providers, your data will be collected and used by them under the terms of their own separate privacy policies.

Here are those individual privacy policies: (all links open in a new window; please note we can't be responsible for the content of external websites)

- [Partnership Card and loans provided by HSBC](#)
- [Home Insurance provided by RSA](#)
- [Specialist Home Insurance provided by Covea](#)
- [Pet Insurance provided by RSA](#)
- [Wedding and Event Insurance provided by RSA](#)
- [Car Insurance provided by Ageas \(Policies up to 18 February 2019\)](#)
- [Car Insurance provided by Covea \(Policies from 19 February 2019\)](#)
- [Interest Free Credit provided By Novuna Personal Finance](#)
- [Payment Plan provided by Novuna Personal Finance](#)
- [Foreign Exchange provided by First Rate](#)
- [International payment provided by HiFX](#)
- [Money Transfers provided by Western Union](#)
- [Kitchen Finance provided by Novuna Personal Finance](#)
- [Personal Loans provided by HSBC](#)
- [Partnership Card provided by Newday](#)
- [Investments provided by Nutmeg](#)
- [Home Insurance provided by Munich Re Digital Partners Limited \(PDF\)](#)
- [Interest Free Credit provided by Creation Consumer Finance](#)

## **14.3 Joint use of your personal data**

We will share data with our providers to bring you relevant offers, updates, products and services, and discounts that reward your loyalty to our brands.

We may check your details with appropriate third parties (for example credit reference agencies, such as Experian) before we send you promotions for our financial services products, to ensure your information is accurate and fulfils our legal and regulatory obligations, and to tailor those offers to you.

Rest assured that all applications for financial services products will be assessed on a case-by-case basis.

## 15. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the [Information Commissioner's Office](#) (ICO) or those of the Office of the Data Protection Authority (ODPA) for Guernsey and the Jersey Office of the Information Commissioner (JOIC) for Jersey.

You can contact the ICO by calling 0303 123 1113.

Or go online to [ico.org.uk/concerns](https://ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

You can also contact the ICO at the following address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

You can contact the ODPA by calling 01481 742074

Or go online to [info@odpa.gg](mailto:info@odpa.gg) (opens in a new window; please note we can't be responsible for the content of external websites)

You can also contact the ODPA at the following address:

Block A  
Lefebvre Court  
Lefebvre Street  
St Peter Port  
GY1 2JP

You can contact the JOIC by calling 01534 716530

Or go online to <https://jerseyoic.org/> (opens in a new window; please note we can't be responsible for the content of external websites)

You can also contact the JOIC at the following address:

2nd Floor  
5 Castle Street  
St. Helier  
Jersey  
JE2 3BT

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found

in Section 16.

## **16. If you live outside the UK**

### ***For all non-UK customers***

This Privacy Notice shall be provided in English, French, Spanish, Portuguese, Malay and Chinese languages. Should there be any conflict in the meanings between the English and translated version, the English version shall prevail.

When placing an order with the Partnership, browsing our website, including for analytics and website usage research, and/or agreeing to receive direct marketing electronic communications as described in this Privacy Notice and our Cookies Notice, your personal data will be processed by us or on our behalf. Of course, you still have the right to ask us not to process your data in these ways, and if you do so, we will respect your wishes.

Sometimes we will need to transfer your personal data between countries to enable us to supply the goods or services you have requested. In the ordinary course of business, we will transfer your personal data to the UK and may also transfer your personal data to third parties located in the UK to your country of residence.

We shall endeavour to ensure that reasonable steps are taken to procure that all such third parties outside of your country of residence shall not use your personal data other than for the services they provide and for which they need the personal data, and to adequately protect the confidentiality and privacy of your personal data.

We will ensure that any third parties only process your personal data in accordance with their legitimate interests. These third parties may be subject to laws that differ from the laws which apply in the country where you reside. We do not actively take steps to ensure that any overseas recipient of your personal data complies with the laws which apply in your country.

If you have any questions, please contact our Data Protection Officer, and we will respond within your local timeframe response requirements. To complain about an alleged breach of this Privacy Notice or our privacy obligations at law, please provide us with as much detail as possible in relation to your complaint. We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner.

### ***Australia***

For the purposes of this Privacy Notice, "personal data" means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, or opinion is recorded in a material form.

We are committed to keeping your personal information secure and will use all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the *Competition and Consumer Act 2010* (Cth).

We store personal information on computer databases and will take reasonable commercial physical and electronic security measures to protect any records that we hold which contain your personal information.

If you are in Australia, you may submit a complaint to our Data Protection Officer who will come back to you within 30 days. If we have not come back to you or you are not happy with the response that you receive you may submit a complaint to the Office of the Australian Information Commissioner.

## **USA**

For information about our cookies and website 'track' or 'do not track' practices please refer to our [Cookies Notice](#).

## **Canada**

If you submit a request to stop direct marketing communications from us, it will take no longer than 10 days.

As your data may be transferred to third parties outside the country where you are located, local police or other enforcement, regulatory or Government bodies may have access to that data with or without the Partnership's knowledge. The personal data we process may be accessed by persons within the Partnership, or our third party service providers, who require such access to carry out the purposes indicated in this Privacy Notice, or such other purposes as may be permitted or required by the applicable law. Personal data we collect is maintained primarily in the UK.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to lodge a complaint with the Office of the Privacy Commissioner of Canada, or in some Canadian provinces, your local Privacy Commissioner.

## **Hong Kong**

Terms used in this Privacy Notice shall have the same meanings ascribed to them in the Personal Data (Privacy) Ordinance (the "PDPO")

Under the Personal Data (Privacy) Ordinance (the "PDPO"), individuals must be notified at the point of collection of the purposes for which the data was collected and thereafter the data can only be used for those purposes unless consent is obtained for a new purpose.

If you are in Hong Kong you may submit a complaint to our Data Protection Officer who will come back to you within 30 days. If we have not come back to you or you are not happy with the response that you receive you may submit a complaint to the Office of the Privacy Commissioner for Personal Data.

## **Singapore, Qatar**

Terms used in this Privacy Notice shall have the meanings assigned to them by the Personal Data Protection Act 2010 (also known as the PDPA).

By placing an order with us, opening an account, browsing our website and/or agreeing to receive digital direct marketing communications, you agree that we may process your personal data as described in this Privacy Notice and our Cookies Notice, including for analytics and research into website use.

## **Malaysia**

Terms used in this Privacy Notice shall have the same meanings ascribed to them in the Personal Data Protection Act 2010 ("**PDPA**").

If you are in Malaysia you may submit any questions, comments or complaints to our Data Protection Officer who will come back to you within 21 days.

## **South Korea**

The transfer of data to enable the company to supply the goods or services a customer have requested can be deemed as a Delegation.

## **EU AND EEA Countries**

If you are sending us your personal data directly you do so within the sphere of your household or personal activity. If you want to purchase a John Lewis product for your business please contact our B2B service. This privacy notice will apply to how any personal data you provide to us is processed.



## **17. Any questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us on **[DPO@johnlewis.co.uk](mailto:DPO@johnlewis.co.uk)**

**Our representative in the EU is MCF Legal Technology Solutions Limited, based in the Republic of Ireland, which you can contact at [JohnLewis@mcf.ie](mailto:JohnLewis@mcf.ie)**

*This notice was last updated on 31/07/24*