



Data Privacy Policy

1. Scope

This Data Privacy Policy (the "Policy") gives you information about all the personal data processed by OD333 Ltd and Figs Investments Ltd and the procedure we follow to ensure compliance with data protection laws, transparency and safeguard individual rights.

2. Purpose

This Policy outlines how we collect, use, disclose, and protect personal data through your use of this website, including any data you may provide when you register with us to purchase a product, a service or both.

This website is not intended for children and we do not knowingly collect data relating to children.

3. Controller

Figs Investments Ltd is a Group of companies made up of Figs Investments Ltd and OD333 Ltd. This Policy is issued on behalf of the Group so when we mention "Company", "we", "us" or "our" in this Policy, we are referring to the relevant company in the Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. OD333 Ltd is the controller and responsible for this website.

4. Personal Data We Collect About You

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, ID number, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

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- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

5. Data Protection Principles and Our Lawful Basis

The law requires us to have a legal basis for collecting and using your personal data. At OD333 Ltd, we adhere to the following principles:

- **Lawfulness, Fairness, and Transparency:** we process your personal data lawfully and fairly.
- **Purpose Limitation:** the data we collect is for specified, legitimate purposes.
- **Data Minimization:** we only collect necessary data.
- **Accuracy:** the data we collect must be accurate and up to date. It is your responsibility to ensure that the data you provide to us is accurate and up to date for instance, your current address, contact and financial details.
- **Storage Limitation:** we will retain data only as long as necessary.

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- **Integrity and Confidentiality:** we will ensure your data is secured against unauthorised access or breaches.

When processing your personal data, we rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

6. Data Subject Rights

You have a number of rights under data UK Data Protection laws in relation to your personal data. These include your right to:

- **Access your personal data** - (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you.
- **Request correction or deletion of inaccurate or unnecessary data.** This enables you to have any incomplete or inaccurate data we hold about you corrected or deleted where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing for marketing purposes.** In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

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- **Withdraw consent at any time** – when we use consent as our lawful basis, you have the right to withdraw your consent at any time.
- **Request data portability (transfer)** – you have the right to ask us to transfer your details to you or another person.

7. Marketing Communication

- **Direct marketing**

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving marketing. We may also analyse your identity, contact, technical, usage and profile data to form a view on which products and services may be of interest to you so that we can send you relevant marketing communications.

- **Opting out of marketing**

You can ask us to stop sending you marketing communications at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences. You can also contact us to request amendment to your marketing preference at info@shyft.today. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes, for instance, those relating to order confirmations for a product or service, warranty registration, appointment reminders, updates to our Terms and Conditions, checking that your contact details are correct, among others.

8. Cookies

OD333 Ltd uses Cookies on its website at www.shyft.today. This helps us to distinguish you from other visitors and improve functionality of our site tailored to your preferences. For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy [here](#).

9. Training and Awareness

We provide employees handling personal data receive regular training and awareness to ensure compliance with data protection laws and company policies.

10. Disclosures of your personal data

We may share your personal data with trusted third parties such as clients, third party suppliers, service providers, professional advisors and other business partners to enable us

conduct our business operations, such as payment processing, legal advice, IT services, among others. We ensure third parties adhere to data protection obligations through contractual agreements and confidentiality.

11. International transfers

We share your personal data within Figs Investments Ltd. This may involve transferring your data outside the UK to our overseas colleagues in and outside of Europe. Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is in place to protect your information. These safeguards may include the use of Standard Contractual Clauses (SCCs) or the UK International Data Transfer Agreement (IDTA) or Addendum, which require recipients to uphold UK data protection standards. Where applicable, we rely on adequacy decisions issued by the UK government, confirming that a country provides an equivalent level of protection. For intra-group transfers, we may implement Binding Corporate Rules (BCRs) approved by the ICO. Additionally, we take technical and organisational measures such as encryption in transit (including the use of SSL / HTTPS) and encryption at rest (such as TDE) to enhance data security.

All third parties processing personal data on our behalf are required to sign Data Processing Agreements (DPAs) that ensure compliance with UK data protection laws. Before any transfer of data, we also conduct Transfer Risk Assessments to evaluate potential risks and apply additional measures as needed to safeguard your personal data.

12. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office (ICO) of a breach where we are legally required to do so.

13. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period

in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

14. Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

15. Responsible Officer

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please get in touch via:

Postal Address:

OD333 Ltd
3 Greengate,
Cardale Park
Harrogate,
North Yorkshire,
HG3 1GY

Email address: info@shyft.today

Telephone number: 0800 7720 093

16. Complaints

You have the right to make a complaint at any time about the way we have collected or handled your personal data either to us or to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. If you remain unhappy with how we've used your data after raising a complaint with us, you can then complain to the ICO using their contact details below:

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



Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Policy Update

This policy was last updated on 27 February 2025