

# Introduction

This Privacy Statement describes how QVC UK ("QVC") collects personal information about you; how we safeguard the personal information we collect; how we use and share such personal information; and how you can contact us regarding our privacy practices.

The "Services" are QVC's websites and applications that QVC makes available for your use, as well as the other means that you may use to interact with QVC online, in-person, and through third party locations. "Services" includes:

- QVC's websites and applications, regardless of medium or how you access them, including contests;
- your interactions with QVC in other locations, such as third party websites and platforms, including social media websites, forums, and platforms;
- your interactions with QVC's other operations, including call centres, physical retail locations or events, in-person visits to QVC's offices and facilities.

## Privacy Statement

### Controller

The Data Controller is QVC UK, Building 8, Chiswick Park, 566 Chiswick High Road, London W4 5XU, United Kingdom, an unlimited liability company incorporated and registered in England and Wales with company registration number 2807164.

QVC is part of a group of companies under Qurate Retail, Inc., and other companies in this group include QVC, Inc., with an address of 1200 Wilson Drive, West Chester, Pennsylvania 19380; HSN, Inc., with an address of 1 HSN Drive, St. Petersburg, Florida 33729; and Qurate Retail, Inc., with an address at 12300 Liberty Boulevard, Englewood, Colorado 80112, USA. In the course of QVC's operations, these other companies may be controllers of personal data.

Akamai Technologies, Inc. provides content delivery, media acceleration, web performance and Internet security analytics and services and in providing such services may process personal data in the form of IP addresses and website activity and measurement data associated with your use of the website (log data). Akamai acts as a controller with respect to these log data processing activities. Information regarding Akamai Technologies, Inc., including contact information for its data protection officer is available at [www.akamai.com/compliance/privacy](http://www.akamai.com/compliance/privacy).

### Data protection officer

If you have questions about this Privacy Statement or your rights, you may contact the legal counsel of QVC by email at [DPOUK@qvc.com](mailto:DPOUK@qvc.com) and by mail at QVC, Building 8, Chiswick Park, 566 Chiswick High Road, London W4 5XU. The data protection officer for QVC is Jeffrey God, who can be reached by email at [DPOUK@qvc.com](mailto:DPOUK@qvc.com) and by mail at QVC, Attention: Jeffrey God, 1200 Wilson Drive, West Chester, Pennsylvania 19380.

## EU Representative

We have appointed our entity based in Italy, QVC Italia S.r.l, (company number 10050721009) whose registered office is Via Guzzina 18, Brugherio, (MB), Italy as QVC EU representative pursuant to Article 27 Reg. (EU) 2016/679 (“GDPR”).

If you are in the EU, please note that you can raise any issues or queries you may have relating to our processing of your personal information and/or to this Privacy Statement, including submitting any request for exercise of your privacy rights, also to QVC Italia.

QVC Italia can be contacted directly by email at the following email address: [Italy.privacy@qvc.com](mailto:Italy.privacy@qvc.com)

## What personal information does QVC collect?

Personal Information You Provide. QVC collects and stores personal information that you give to us when you use the Services, such as:

- Contact information: such as names, addresses, emails, user logins, and phone numbers
- Financial information: such as your credit card or bank information for purchases, or other information when applying for Easy Pay or using other payment options
- Order information: details surrounding purchases
- Communication information: such as when you have contacted us, or we have contacted you; content information of your emails or chats with QVC or recordings of your phone calls with QVC
- Forum / Review information: such as your reviews of products on QVC websites or applications; images or feedback you may provide on QVC user forums
- Preferences: such as email offers preferences, personalised/interest-based advertising preferences, and preferences to be contacted for market research
- Security – CCTV images
- Images and Videos
- Birthday

If you do not want to provide to us personal data that we need to fulfill a statutory or contractual requirement, or a requirement necessary to enter into a contract, then the consequences may be that you are unable to make purchases from QVC or to use QVC's services or websites.

**Personal Information Collected Automatically.** In addition to information that you provide to us, we collect other information using automated means such as cookies, web beacons, embedded scripts, and other kinds of technology.

- Browsing and use information: such as pages, links, videos, products, and content viewed, applications used or viewed, and metrics surrounding those views including time, length of visit, the locations viewed before and after
- Device and technical information: such as the internet protocol (IP) addresses of computers or devices you use, device identifiers, browser characteristics, operating system details, language preferences, referring uniform resource locaters (URLs), services used, telecommunications data (source, metrics, logs), log files, audit trails, or cookie IDs
- Demographic or interest information (some portions aggregated to postal code): such as age, product category interests, location, income, family status, birthday, gender, fiscal code

**Personal Information Obtained from Third Parties.** We also obtain information about you from other sources and combine that with information we collect about you through the Services. We are only able to correct information we hold, not that held by the third-party providers.

- Personal data may be created through social media platforms – like Facebook, Twitter, Pinterest, and other public platforms. If messages are posted about QVC on social media platforms, we may collect data related to that message, including the message’s content, the social media “handle” of the person making the message, the time and date of the message, responses, “likes”, and other kinds of information related to the message. Also, we may collect and use personal data that you choose to provide to QVC if you decide to communicate with QVC through social media platforms or if you decide to give us access to your personal data from these social media platforms.
- Publicly available information: This information may include, for example, number of household members, household income range, or postal code. Such information may be associated with personal information you provide, such as your name, email address, physical address, or phone number.
- Information that we obtain from credit reference agencies: We may perform credit and identity checks on you with credit reference agencies to assess creditworthiness and product suitability, (including when you request to use Easy Pay as your payment option), to check your identity and prevent criminal activity. The information checked will include information on public registers (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.
- Information that we obtain from third parties: Information obtained will be added to our existing information about customers and people who use our Services to better understand their interests and to provide more relevant content and advertising.

### Why does QVC need my personal information?

As a data controller, we will only use your personal information if we have a legal basis for doing so under applicable UK privacy law. The purposes for which we process your information and the legal basis on which we carry out each type of processing are explained below.

#### **Provide services and features you request, including to create and manage your account**

Legal basis: To take steps prior to and to perform the contract

Data types: Contact information, preferences, financial information, communication information

#### **Process, fulfill, and ship orders and contact you as needed for these orders**

Legal basis: To take steps prior to and to perform the contract

Data types: Contact information, order information, financial information

#### **Respond to requests, comments, or questions, and to provide customer support, including QVC managed social interactions and chat**

Legal basis: To respond to a request coming directly from the interested data subject

Data types: Contact information, communication information, preferences, order information, forum / review, financial information

### **Call recording and monitoring**

Legal basis: Legitimate interest - customer experience, quality control, and communications

Data types: Contact information, communication information

### **Enable and improve website functionality**

Legal basis: Legitimate interest - better customer experience

Data types: Contact information, preferences, device and technical information, browsing and use information

### **Personalise and improve your experience using the Services; Target marketing efforts to appropriate audiences, including use of retargeting ads across other websites, devices, and platforms**

Legal basis: Legitimate interest (relevant advertising, better customer experience, efficiency). Consent

Data types: Contact information, order information, browsing and use information, device and technical information, preferences, demographic or interest information

### **Monitor and analyse trends, usage, and activities of users of the Services, customise, and improve the Services' content, products, and services**

Legal basis: Legitimate interest - better customer experience, efficiency, providing tailored product offering

Data types: Contact information, order information, device and technical information, browsing and use information, demographic or interest information

### **Send you marketing materials and offers for products and services that we think may interest you**

Legal basis: Consent, without prejudice to legitimate interest where possible (e.g., direct mail).

Data types: Contact information, preferences, order information, browsing and use information, demographic or interest information

### **Contact you regarding your use of the Services, your transactions**

Legal basis: Legitimate interest - improving transparency and awareness

Data types: Contact information, order information

### **Contact you in our discretion regarding changes to our policies**

Legal basis: Compliance with legal obligation

Data types: Contact information, order information

### **Evaluation for payment options**

Legal basis: To take steps prior to and to perform the contract

Data types: Contact information, order information, financial information

### **Prevent fraud or other misuse**

Legal basis: Legitimate interest - protect customer and business information, payment defaults and financial damage

Data types: Contact information, order information, financial information, device and technical information, browsing and use information

### **Conduct research and analysis, including focus groups and surveys**

Legal basis: Legitimate interest (relevant advertising, better customer experience, efficiency). Consent

Data types: Contact information, order information, browsing and use information, device and technical information, preferences, demographic or interest information

### **Enforce our policies, comply with legal obligations**

Legal basis: Compliance with legal obligation

Data types: Especially, contact information, order information, financial information, device and technical information, browsing and use information; potentially all data types

### **Adhere to industry standards, and otherwise manage our business**

Legal basis: Legitimate interest - comply with the law, standards, and Terms and Conditions

Data types: Especially, contact information, order information, financial information, device and technical information, browsing and use information; potentially all data types

### **Maintain user forums and product review capabilities**

Legal basis: Legitimate interest - better customer experience

Data types: Contact information, forum/review information, order information

## **To carry out checks to assess your suitability for certain products**

Legal basis: Compliance with legal obligation. Legitimate interests (protect our commercial interests)

Data types: Contact information, order information, financial information

## Customer segmentation

To give you the best possible customer experience, we need to get a good picture of who you are. To help us to do that, we run a customer segmentation programme, using a third party service provider who allocates customers to certain categories or segments based on, for example, their age, address, gender and order data (i.e., what they have purchased). Our service provider then enriches that information with so-called lifestyle data. These are just statistics-based assumptions, for example on your probable life situation (eg single household), your shopping habits, your media usage (e.g., "online", "TV", "magazines", "social networks") and your location. Based on the overall information, we assign you to a specific customer segment, and we then delete the lifestyle data. The segment you are in becomes part of your customer record. This allows us to offer you promotions, products and services that are most likely to interest you. Customer segmentation and data processing are done under a legitimate interest basis meant to enrich your experience so that you only receive advertising that is tailored to your individual needs, while serving QVC's interest in engaging its customers.

## Who do you share my personal information with?

### *Service providers and affiliates*

We grant individuals who help QVC provide the Services access to your personal information, as necessary to perform the tasks required. These people may work for third party service providers. These third-party service providers are required to agree to safeguard your personal information appropriately and according to law. QVC may also share your personal information with certain "Affiliates" in their capacity as the direct and indirect owners of QVC. These owners include Qurate Retail, Inc. and its direct and indirect owners. QVC may also share your personal information with certain other Affiliates as necessary to perform the tasks required, and these Affiliates include QVC, Inc., HSN, Inc., zulily llc, and the other companies that are directly or indirectly owned by Qurate Retail, Inc.

### *Credit reference agencies*

We may perform credit and identity checks on you with a credit reference agency, namely Experian Limited ("Experian") to assess creditworthiness and product suitability, check your identity and prevent criminal activity. We will perform those checks if you meet relevant criteria (for instance if your order exceeds a certain monetary threshold or if we are conducting fraud checks), including when you request to use Easy Pay as your payment option. To do this, we will supply your personal information to Experian and it will give us information about you. The information checked will include information on public registers (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. More information on Experian and its role also as a credit reference agency, the data it holds, the ways in which they use and share personal information, data retention periods and your data protection rights is available at: <https://www.experian.co.uk/legal/crain/>

### *Other third parties*

We also share personal information about you with others for additional purposes, including:

- As required or permitted by applicable law, for compliance with a legal obligation; establishment, exercise or defense of legal claims, or if we believe in good faith that such disclosure is necessary.
- At the request of government authorities conducting an investigation.
- With our third-party service providers for order fulfillment, shipping, processing payments, customer service, account servicing, customer research, marketing, provision of information technology services, and records maintenance;
- If we believe there has been a violation of our terms or policies, or to protect anyone's rights, property, life, health, security, or safety;
- In connection with any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure, or repossession), lease, amalgamation, or any other type of acquisition of all or any portion of QVC's assets, financing, disposal, conveyance, or transfer of all or a portion of our business to another company;
- With third parties that conduct analytics or data appending to help us offer you more relevant products and services; or
- For other purposes disclosed elsewhere in this Privacy Statement, or at the time you provide your personal information.

Aggregated or de-identified information that cannot be used to identify an individual and anonymised information is not considered personal information that is covered under this Privacy Statement.

### Data Transfers outside of the UK and EEA

QVC's Affiliates and third-party service providers having access to personal data may be located in other countries, and not all of these countries are recognized as providing an adequate level of protection for personal data. Any transfer of data to an Affiliate or third-party service provider located in such a country is covered by an appropriate transfer mechanism under UK privacy law. You may contact the DPO or legal counsel at the information provided if you would like more information about transfer mechanisms in place.

Where restricted, sensitive personal data types will not be transferred outside of the country. Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by UK privacy law to be "sensitive personal data".

### Links to Other Websites

Our Services contain links to websites or applications controlled by third parties, for your convenience and information. Some linked websites or applications are operated by entities not affiliated with QVC, and these linked websites or applications have their own privacy policies or notices. If you visit other websites or applications through links found on QVC's Services, please review the posted privacy policies on those websites or applications. QVC is not responsible for the content or privacy practices of any website or application that is not controlled by QVC.

### Automated decision-making

We sometimes use algorithms to make decisions on our behalf. This is referred to as automated decision-making. We use automated decision-making for the following purposes:

### **To assess your suitability for Easy Pay**

Our algorithms assess your suitability for Easy Pay based on information such as your age, financial position and other circumstances which help indicate whether you will be able to pay us back. This means that we may automatically decide that you are not suitable for Easy Pay, in which case we will reject your application.

### **To detect and prevent fraud**

Our algorithms may freeze a transaction or account if we suspect fraud against QVC. Such decisions are based on patterns in our data, such as an account being used in a way that fraudsters work.

You have the right to contest the decisions we make using automated decision-making, please see the Privacy Rights section for more information in this regard.

### How long does QVC keep your personal information?

Personal information is retained based on legal, business, and contract requirements. If you have additional questions regarding retention, please contact [DPOUK@qvc.com](mailto:DPOUK@qvc.com). If you are located in the EU, you can also contact our EU representative by email at the following address: [Italy.privacy@qvc.com](mailto:Italy.privacy@qvc.com).

Personal information will be deleted, anonymised, or be limited to specific purposes and kept for no longer than is necessary, taking into account the limitation periods for potential claims. If a type of personal information is used for more than one purpose, then the personal data would be restricted, but kept for the longest applicable period.

Retention of your account, including name (first, last), address (street address, city, post code), email and customer number, will be kept pending an annual review for the limited purposes of fraud prevention and warranties. Retention of this information will be reviewed on an annual basis to confirm that the additional purposes still apply. Criteria will include risk of storage and exposure, as balanced with legal requirements for criminal and civil fraud limitation periods, financial and security risk, warranty periods, and customer status.

Requests for deletion will be kept for no longer than is necessary, as required or permitted by applicable law, for compliance with a legal obligation; establishment, exercise or defense of legal claims, or if we believe in good faith that such disclosure is necessary; at the request of government authorities conducting an investigation; if we believe there has been a violation of our terms or policies, or to protect anyone's rights, property, life, health, security, or safety; to resolve outstanding disputes; or to troubleshoot existing problems, such as submitted security or functionality issues.

Logs within systems will be kept with consideration of the type of data in the system, as well as legal and regulatory guidance requires.

### How does QVC protect your personal information?

QVC maintains security measures to protect personal data from loss, misuse, unauthorised access, disclosure, alteration or destruction taking due account of the nature of the data and the risks involved in the processing.

### Where can I get more information?

See details regarding your [Privacy Rights](#), or if you have questions about this Privacy Statement or would like more information about our privacy practices, please contact us at [DPOUK@qvc.com](mailto:DPOUK@qvc.com).

As noted at the beginning of this Privacy Statement, if you are located in the EU, you can also contact our EU representative by email at the following address: [Italy.privacy@qvc.com](mailto:Italy.privacy@qvc.com).

### Changes to This Privacy Statement

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to this notice which materially affect your rights or the purposes for which we collect and process personal data. We encourage you to review this Privacy Statement when you use QVC's Services, as the current version will be available. This Privacy Statement was last revised on **January 3<sup>rd</sup>, 2022**.

## Privacy Rights

You have rights regarding your personal information. These rights include your ability to know how we are using your personal information, the ability to access, update, change, and even delete your personal information. This section is where you can learn more and exercise your rights.

### The right to be informed

You have the right to know how QVC is using your personal information. Refer to the section above "[Why does QVC need my personal information](#)"

### The rights of access & rectification

You have the right to know what personal information we have collected about you as well as manage and update your personal information.

At QVC, you can access and manage much of your information in the My Account section. You can also contact Customer Care to view and update your info.

[Go to My Account](#)

[Contact QVC Customer Care](#)

You can change your preference for receiving marketing communications from us at any time through [your account settings](#), by clicking on the "unsubscribe" link in any email communications, or by [contacting our Customer Care team](#). Your profile will be updated to ensure that your preferences are respected. Please

note that you will still receive communications about your account and orders from time to time (see the [“how we may use your information”](#) section). Please also note that if you sign up to receive promotional emails on our websites or on third party websites, outside of your marketing preference settings we will update [your marketing preference settings](#) so you can receive our emails.

### *Manage Your Marketing Preferences*

You can change your preferences for seeing personalised advertisements by QVC, which may use your browsing history on QVC to make advertisements more relevant for you. Personal data such as name, address, and the like are not used, but we may use cookies to enable these ads. Note, even if you choose not to see personalised ads, you may still see ads provided by QVC on other websites or apps; they just won't be personalised.

### *Manage Your Advertising & Tracking Preferences*

You have control over what tracking and data collection takes place during your visits to QVC's website and apps. Data collection for analytics and personalisation, targeted advertising, and loyalty programs are enabled to provide a quality consumer experience. However, you can change your preferences to make sure you are comfortable with the ways we collect and use your information while you are on QVC's website and apps.

### *Manage Your Privacy Preferences*

You can also change your overall cookie settings, which will prevent some Services not to work, but will eliminate all data processing. You can learn more about our use of cookies, web beacons and similar technologies and how to manage them in our Cookie Policy.

### *Learn More about Cookie Settings*

You can request a copy of the personal data we hold on our systems about you. If you wish to do so, please submit a request [here](#). We will contact you and ask some further questions to confirm details before we provide any information.

### *Request to Receive a Copy of Your Data*

### Right to Be Forgotten

You have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

Deleting your data requires us to also delete your account. This means we will deactivate your account and delete information associated to it. However, we may retain archived copies of your information as required by law for legitimate business purposes such as to help address fraud and spam. Retention of this information will be reviewed on an annual basis to confirm that the additional purposes still apply.

Please note that if you have shared any information through the QVC social media channels for example, that information may remain visible even after you have closed your account.

Additionally, if you continue to browse QVC's website or apps, but do not want us to track your information, you should update your Privacy Preferences.

For this request, we will contact you and ask some further questions to confirm details before we provide any information.

[Learn More & Submit a Request to Delete Your Data](#)

### Right to Restrict Processing of Your Data

Restricting processing will limit some of the features that you enjoy when using our Services. This may include a less personalised experience, and a decreased ability to show you the products that you love.

If you would like to change your marketing, email and other privacy preferences, find out how [here](#).

Under the Right to Restrict Processing, you may also question the legality of our processing or retention period for data.

Should you wish to limit the reasons we process your personal information, please submit your request here. We will contact you and ask some further questions to confirm details before we provide any information.

[Request to Restrict the Processing of Data for Your Account](#)

### Right of Data Portability

You have the right to obtain your personal data collected by QVC for your own purposes across different services. Any data we capture based on the legal basis of contract; we must provide to you in a machine-readable format.

[Submit a Data Portability Request](#)

### Right to Object to Our Data Processing

You may object to why we believe we have the right to process your personal information. If we are processing your data with consent, that consent may be withdrawn at any time. If you believe we have determined the incorrect basis for processing, please submit your request [here](#).

[Submit Your Objection](#)

### Rights in relation to automated decision making and profiling.

Where QVC uses automated decision-making, you have the right to challenge and request a human review such decisions. If you would like to challenge an automated decision, please contact us at [dpo@qvc.com](mailto:dpo@qvc.com). If you are located in the EU, you can also contact our EU representative by email at the following address: [Italy.privacy@qvc.com](mailto:Italy.privacy@qvc.com).

### What to do if your rights have been violated

In the event you have a complaint about violations of your data protection rights, or if you are not satisfied with the results of review, complaint and appeal procedures within QVC, you can also contact the Information Commissioner's Office (ICO). QVC has committed to cooperate in investigations by and to comply with the advice of competent regulator in such case. If you have an unresolved privacy or data use concern which has not been addressed satisfactorily, you may contact the legal counsel of QVC UK by email at [DPOUK@qvc.com](mailto:DPOUK@qvc.com), and by mail at QVC, Building 8, Chiswick Park, 566 Chiswick High Road, London W4 5XU. You may also contact the data protection officer for QVC, Jeffrey God, who can be reached by email at [DPOUK@qvc.com](mailto:DPOUK@qvc.com), and by regular mail at QVC, Attention: Jeffrey God, 1200 Wilson Drive, West Chester, Pennsylvania 19380. **If you are located in the EU, you can also contact our EU representative by email at the following address: [Italy.privacy@qvc.com](mailto:Italy.privacy@qvc.com).**