

# PRIVACY POLICY

## 1. WHO WE ARE?

Rocco Bear referred to as "we", "us" or "our" in this Privacy Policy) is the Data Controller and responsible for deciding how your personal data is collected, stored and used.

## 2. WHAT INFORMATION DO WE COLLECT AND USE?

The personal data we collect and use is dependent on the reasons that we need the data and whether you are browsing or buying online.

We collect most information directly from you when you make a purchase from our website. We need different types of information and have provided details of the categories of data we collect, why it is required and where we get the data from. We will never collect more data than is necessary, in accordance with the data minimisation principle of the relevant data protection laws.

Our use of your details will depend on you and what you are doing when using our website, such as whether you are browsing or purchasing, if you are new to us or a registered customer.

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, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes name, card issuer and card type, number, issue number, start and expiry dates and CVV code (we don't retain this); gift/store card details if used.
- **Transaction Data** includes details about orders and 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 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 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.

## COOKIES

**Cookies** allows us to get technical details from the devices you use to access our website and from cookies which tell us what you look at online, where and when. Our technology also lets us know when and how you use our websites, such as when you have added to or abandoned your basket or filled in a form.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data, but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your **Usage Data** to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### When you purchase products from us

This includes when you:

- Purchase our products (as a guest or a registered user);
- Create an account on our website or utilise the live chat function on our website;
- Make a telephone call to us and leave a message or request a call back;

What we collect	Why we need it	Where we collect it from
Identity Data and Profile Data	To administer your order (including dealing with enquiries, issues, returns or payments) and delivery of your products. To set up and administer your account, to	You, when completing your purchase or if you call us or if you create an account with us via our website.

	keep details of your orders and make sure the check-out process is efficient and convenient.	
Contact Data	To administer your order (including dealing with enquiries, issues, returns or payments) and delivery of your products. To set up and administer your account, to keep details of your orders and make sure the check-out process is efficient and convenient.	You, when completing your purchase or if you call us or if you create an account with us via our website.
Financial Data	So we can check the right individual is using the right card/account and meet the payment requirements of the card/account issuers. We also need to make sure we are paid for what you purchase. So we can process refunds and to keep a record of any financial transactions with you for tax purposes.	You, your payment / card issuer if selected by you when you complete your purchase.
Technical Data	So our website technology works efficiently with your device and to make sure you can use our website as intended. If you have registered to receive our marketing communications, we will personalise your emails based upon your interaction with our website across your devices. This also allows us to remember information about you, even when you are using different devices, so that we are able to form a rounded view of your preferences and products that are of interest to you.	You, if you browse our website technology interaction with your browser/devices.

### Information about our website and your personal devices

What we collect	Why we need it	Where we collect it from
Cookies	Cookies provide valuable information about how our users interact with our website. The data we collect can be used to create a more tailored, personal and enjoyable experience. They can also have a practical use, storing usernames and passwords, making the check-out process more convenient.	You, if you browse our website.
Technical Data and Usage Data	As you interact with our website and the emails we send to you, we may automatically collect Technical Data about your equipment, browsing actions and	You, if you browse our website technology interaction with your browser/devices.

	patterns. So our website technology works efficiently with your device and to make sure you can use our website as intended. If you have registered to receive our marketing communications, we will personalise your emails based upon your interaction with our website across your devices. This also allows us to remember information about you, even when you are using different devices, so that we are able to form a rounded view of your preferences and products that are of interest to you.	We may also receive Technical Data about you if you visit other websites employing our cookies.
Contact Data – Telephone Number	So we can provide you with updates regarding your delivery.	You, when completing your purchase online.

#### Contact History

What we collect	Why we need it	Where we collect it from
Identity Data Profile Data	If we are in contact with you by way of our live chat function, email or telephone, we will collect Identity Data alongside details of your enquiry or issue you have raised. If you have made a purchase, we will also collect your order number. We require these details to access your account (if you have registered with us), to investigate, consider and respond to your enquiry/complaint. We retain a log of all previous correspondence we have with you, in order to have an audit trail in the event of a dispute.	You, if you contact us via our website or by telephone.

#### Purchase History

What we collect	Why we need it	Where we collect it from
We collect Transaction Data relating to products you have purchased in the past	We retain this data as it is a convenient way of recording all current and past purchases. It allows us to have up-to-date data on each purchase made, including	You, when completing your purchase online.

(whether you are a guest or a registered user) and what you have searched for.	for delivery updates. It also allows us to spot trends and understand our customers and their interests/preferences.	
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## Payment Information

What we collect	Why we need it	Where we collect it from
Financial Data	So we can check the right individual is using the right card/account and meet the payment requirements of the card/account issuers. We also need to make sure we are paid for what you purchase. So we can process refunds and to keep a record of any financial transactions with you for tax purposes.	You, your payment / card issuer if selected by you when you complete your purchase.

## Our Social Media Pages

What we collect	Why we need it	Where we collect it from
Identity Data Contact Data	If you react to our marketing posts on Social Media (including but not limited to our Facebook & Instagram pages) or provide us feedback via our Social Media. We consider the views and opinions of our customers and analyse the feedback we are provided. We may want to respond, react, or repost. We will always request your permission before using your photograph.	You, when you post or comment on our Social Media pages.

## Competitions, Promotions or Surveys

What we collect	Why we need it	Where we collect it from
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Identity Data	When you respond to a survey, we keep a record of responses to help us understand how we can improve our services. When you enter into our competitions, we use your data to enter you into and administer the competition.	You, if you complete a survey with us online or enter into a competition with us online.
Contact Data		

## Marketing Communications

What we collect	Why we need it	Where we collect it from
Identity Data Contact Data (Including any marketing preferences you have selected)	<p>We use this data to send you information in accordance with your marketing preferences. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you via email. If you would like to opt-out of receiving communications via post, please email <a href="mailto:enquiries@roscobear.co.uk">enquiries@roscobear.co.uk</a>.</p> <p>Alternatively, you can contact us via customer services and we can manually unsubscribe you from our mailing/marketing lists. Please note, you may continue to receive marketing for a short period while we deal with your opt-out request.</p> <p>We will not send you marketing messages if you tell us not to, but if you receive a service from us we will still need to send you occasional service-related messages. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions. Think this can be removed as we no longer use SMS (or give marketing preference for this medium). We do however send post so think it should be replaced with Post.</p>	<p>You, if you register to receive our marketing communications.</p>

Cookies Technical Data Usage Data	Some marketing will be undertaken by profiling, which allows us to tailor the marketing communications and offers we may send you. We also use this information to try to understand more about our customer and what they are interested in.	You, your interaction with our website using your browser/devices, cookies and other similar technologies which track the pages you visit.
Data relating to your interaction with our email communications, including clicks and open status		You, if you register to receive our marketing communications.
Child Data – name, date of birth and gender	Our website is not intended for the use of children. If persons above the 18 choose to provide us with Child Data (those persons under the age of 13), we collect this data in order to send you relevant marketing and promotional materials around the time of the child's birthday.	You, if you choose to provide us with this data at the time of completing your purchase.

### 3. WHAT INFORMATION DO WE COLLECT FROM THIRD PARTIES?

We may receive personal data about you from various third parties in the form of Technical Data, Profile Data, Usage Data, Marketing and Communications Data, and Aggregated Data:

- a) Analytics providers such as Google;
- b) Advertising networks;
- c) Search information providers;
- d) Third party providers of technical, payment and delivery services;
- e) Third party data brokers; and
- f) From publicly available sources.

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 notice of every website you visit.



Google will use your personal data for personalisation of ads and that cookies may be used for personalised and non-personalised advertising. For further information, refer to [Google's Privacy & Terms site](#)

#### 4. WHAT IS OUR LAWFUL BASIS FOR USING YOUR PERSONAL DATA?

Under the relevant data protection laws, we must have a legal reason to use your personal data, often referred to as a “legal or lawful basis for processing”. Please note that we may use your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. We have set out below a description of all the ways we intend to use your personal data, and which of the lawful bases we rely on to do so.

Why we use your personal data	Lawful basis for use
Where we need to perform the contract we are about to enter into or have entered into with you	Contract or for taking preliminary steps for that contract
Register you as a new customer	Necessary for our legitimate interests
Process and deliver your order including: a) To manage payments, fees and charges b) To collect and recover money owed to us	i. Performance of a contract with you ii. Necessary for your legitimate interests (to recover debts due to us)
Manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey	i. Performance of a contract with you ii. Necessary for your legitimate interests (to keep our records updated and to study how customers use our products/services) iii. Necessary to comply with a legal obligation
Enable you to partake in a prize draw, competition or complete a survey	i. Performance of a contract with you ii. Necessary for our legitimate interests (to study how customers use or products, to develop our products/services and grow our business)



Administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>i. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);</li> <li>ii. Necessary to comply with a legal obligation</li> </ul>
Deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/ services, to develop them, to grow our business and to inform our marketing strategy)
Use data analytics to improve our website, products/ services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and inform our marketing strategy)
Make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/ services and grow our business)
Marketing	<p>Where it is in our legitimate interests to do so, we will send you marketing communications by way of email or post if you have:</p> <ul style="list-style-type: none"> <li>- requested information from us; or</li> <li>- purchased goods or services from us; or</li> <li>- provided us with your details when you entered a competition; or</li> <li>- registered for a promotion; and in each case, you have not opted out of receiving that marketing</li> </ul>
Third-party marketing	We will get your express opt-in consent before we share your personal data with any company outside of Rocco Bear for marketing purposes

## 5. HOW LONG WILL WE RETAIN YOUR PERSONAL DATA ?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for accounting and tax purposes. This includes guest and registered users' personal data.

## 6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may disclose your personal data with the third parties for the purposes described in paragraph 3 above. We will only disclose such personal data to any third party as is necessary to enable them to carry out the function or purpose for which it is disclosed. We require all third parties to respect the security of your personal data and to treat it in accordance with the relevant data protection laws. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We do not sell any personal information to any third party so that they can send you their marketing material.

We have categorised the third parties as follows:

- **IT Suppliers and Service Providers**

We use third parties to provide us with our IT systems and support for them. They may access your personal data only to the extent that they need to in order to provide their services.

- **Delivery Companies**

We use third parties to deliver your order to you.

- **Legal and Regulatory Requirements**

We will share your personal data with entities, companies or individuals (including the ICO, HMRC, Fraud Prevention Agencies, the Police, Government bodies and Regulators).

- **Card Payment Processor**

Your personal data and card payment details will be processed for the purposes of dealing with payment transactions.

- **Website Analysis and Profiling Companies:**

We use third parties to analyse how our website is used including analysis of browsing or customer traffic patterns to enable us to improve our website and your experience when using it.

- **Professional Advisors**

We may share your personal data with our professional advisors (including lawyers and insurers) to take advice in instances such as dealing with a complaint or claim which you make.

- **Merger**

In the event that we sell, transfer or merge parts of our business or our assets. We may transfer personal information that we have collected as described in this privacy policy, along with our other business assets, to the organisation that we are selling to or merging with.

- **Third party content and links on our websites**

Our website may feature links to third parties. We do not send them your details but if you follow those links, you will leave our website. You can choose to share your personal data with them separately and it is subject to their Privacy Policy.

## **7. DO WE TRANSFER DATA OUTSIDE THE UK/EEA?**

We do not share your personal data outside the UK/EEA.

## **8. HOW DO WE KEEP YOUR INFORMATION SECURE?**

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.

## **9. WHAT ARE YOUR RIGHTS?**

You have a number of rights over your personal data under the relevant data protection laws, which are as follows:

- Right of access to your personal data: the right to ask what personal data we hold on you and to have a copy of your personal information from us (commonly known as a Subject Access Request)
- Right to rectification of your personal data: the right to ask us to correct any errors in your personal data;

- Right of erasure of your personal data: the right to ask us to delete your personal data where i) we do not require your personal data anymore, ii) you withdraw your consent to our use of your personal data and we have no other legal basis to keep your personal data, iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing, iv) our use of your personal data is illegal, or v) we have to delete your personal data to comply with our legal obligations.
- Right to data portability: the right to ask us to provide you with a copy of the personal information you have provided to us in a structured, commonly used and machine-readable format and the right to transmit that personal data to another company where i) we are using your personal information on the basis of your consent or on the basis that it is necessary to perform a contract with you; and ii) the use we are making of your personal data is carried out by automated means;
- Right to object to the processing of your personal data: the right to object to our legitimate interests, profiling activities and marketing communications.
- Right to restrict your personal data: the right to ask us to restrict the use that we are making of your personal data where: (i) you don't think the personal data we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal data is illegal but you would rather we stop using your personal data rather than delete it; (iii) we don't need your personal information anymore, but you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing; and
- Right to withdraw consent: where our use of your personal data is based on consent, the right to withdraw your consent at any time.

Full name of legal entity: Rocco Bear

Email address: [enquiries@roccobear.co.uk](mailto:enquiries@roccobear.co.uk)

Postal address: Rocco Bear, Marsh Lane, Holmes Chapel, Cheshire, CW4 8QB.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.

**This Policy was last updated in September 2025. We will update it from time to time and if we make any changes that could affect you, we will give you due notice of this via our website.**

## GLOSSARY

1. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
2. Lawful Basis/Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPO.
3. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
4. Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (known as anonymous data).



# Rocco Bear

## COOKIE POLICY

### Information about our use of cookies

We use cookies and similar technologies to enhance site navigation, analyse site usage and assist in our marketing efforts.

### What are cookies?

A cookie is a small piece of data (text file) sent to your browser by a website you visit. Cookies are stored on your device (computer, smartphone, etc) when you first visit a website. We use cookies when you visit our website. You can choose not to permit some types of cookies, but declining the use of some cookies may impact your experience of the website and the services we offer.

### How do we use cookies?

We use cookies for:

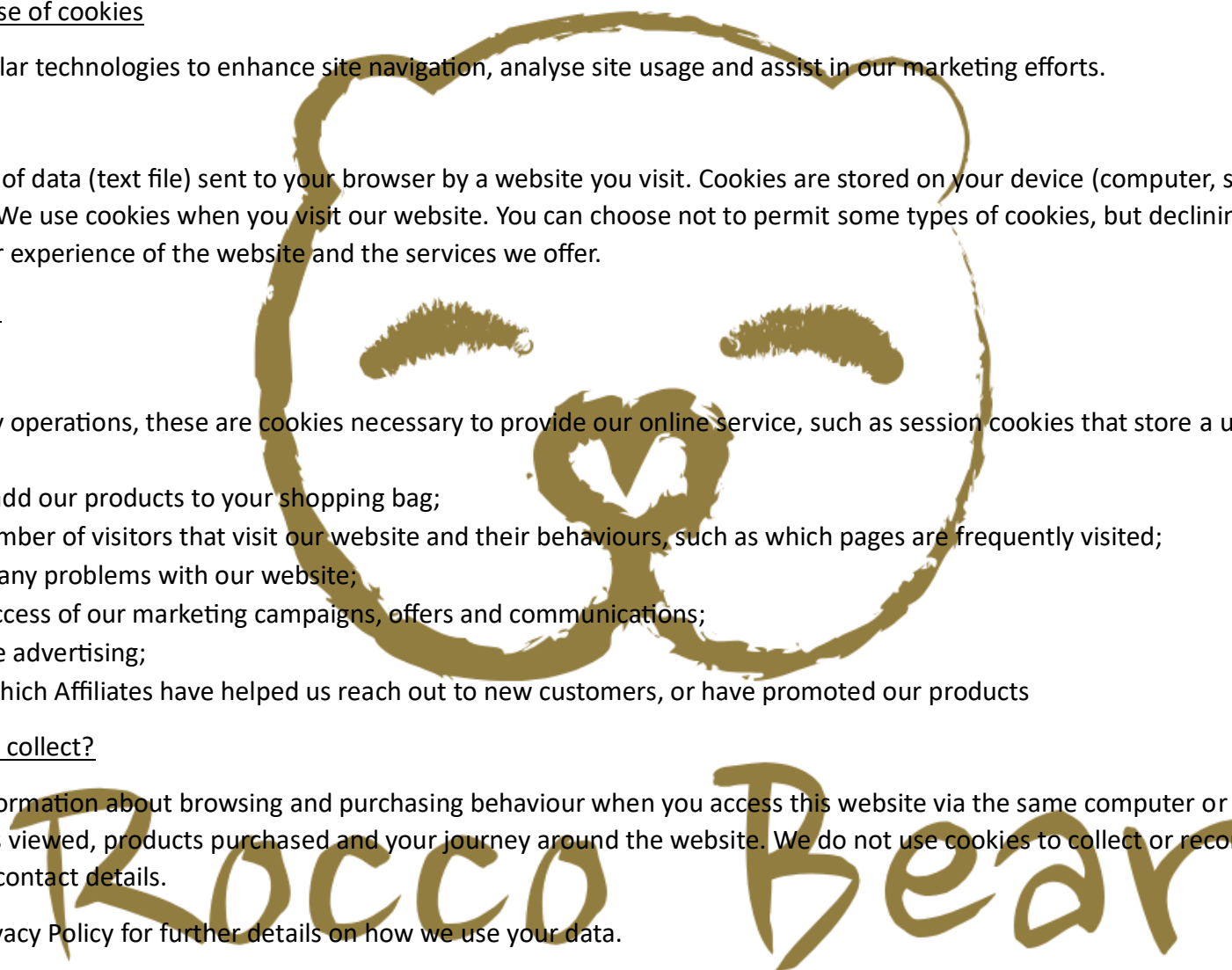
- Strictly necessary operations, these are cookies necessary to provide our online service, such as session cookies that store a user's log in on our website;
- Allowing you to add our products to your shopping bag;
- Analysing the number of visitors that visit our website and their behaviours, such as which pages are frequently visited;
- Troubleshooting any problems with our website;
- Assessing the success of our marketing campaigns, offers and communications;
- Targeting suitable advertising;
- Understanding which Affiliates have helped us reach out to new customers, or have promoted our products

### What information do we collect?

Some cookies collect information about browsing and purchasing behaviour when you access this website via the same computer or device. This includes information about pages viewed, products purchased and your journey around the website. We do not use cookies to collect or record information on your name, address or other contact details.

You may refer to our Privacy Policy for further details on how we use your data.

### What types of cookies do we use?



We set cookies in order to remember information about you, such as your language preference and your user login information. These are called first-party cookies.

We also use third-party cookies, which are cookies from different domains to our website. We use third-party cookies for our advertising and marketing.

More specifically, we use cookies and other technologies for the following purposes:

### **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the website will not then work. These cookies do not store any personally identifiable information.

### **Performance Cookies**

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our website, and will not be able to monitor its performance.

### **Functional Cookies**

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.

### **Targeting Cookies**

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

### What is the duration of a cookie?

Cookies can be stored for varying lengths of time on your browser or device. For instance, strictly necessary essential 'session' cookies do not retain any information on your device or send information from your device. These cookies can be deleted when the session expires or is terminated when the browser window is closed. Persistent cookies are stored on a user's device in-between sessions. These cookies can be used to recognise your device in order to



optimise your user experience and create personalise marketing. Persistent cookies will remain stored on your computer or device until deleted or until they reach their expiry date set by us or the third-party.

Most browsers allow you to manage how cookies are set and used as you're browsing, and to clear cookies and browsing data. Also, your browser may have settings letting you manage cookies on a site-by-site basis.

#### How to contact us

We welcome you to get in touch if you:

- Have any questions or feedback about this policy
- Would like to us to stop using your information
- Want to exercise any of your rights set out in our Privacy Policy, or have a complaint

Please do not hesitate to contact us at [enquiries@roccobear.co.uk](mailto:enquiries@roccobear.co.uk)

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.



# Rocco Bear