

## PRIVACY POLICY

### Introduction

This notice applies to all the services we provide.

When we say 'personal data' we mean information about you or the company, like your or its name, email, address, telephone number, payment information, and so on. If you can't be identified, then this notice doesn't apply.

### Who is 'we'

When we refer or use the terms 'we' (or 'our' or 'us'), that means Xcel Bespoke ("Xcel"). Our Australian headquarters are in Sydney Australia, and our address details are available on the Contact Us page of our website.

### How we collect your data

If you visit our website or use our services, we will collect personal data from you. The way in which we collect it can be broadly categorised into the following:

**Information you provide to us directly:** When you contact us through the website or use our services, we will ask you to provide personal data to us. If you don't want to provide us with your personal data, you don't have to, but it might mean we won't be able to provide our services to you effectively.

**Information we collect automatically:** We collect some information about you automatically when you visit our website or use our services. We also collect information when you navigate through our website, including what pages you looked at and what links you clicked on. This information helps us get a better understanding of how our website is performing and what services are most relevant so that we can continue to provide the best customer experience possible.

**Information we get from third parties:** The majority of information we collect, we collect directly from you and your business as part of our service. We use this information to supplement the personal data we may already hold about you, to provide our services. When we collect personal data, we'll only process it:

- to perform a contract with you, or
- in accordance with a legal obligation, or
- where we have your consent.

If you're someone who doesn't have a relationship with us but believe that someone has entered your personal data into our services, you'll need to contact that person with any questions or possible actions you might have about your personal data.

### How we use your data

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Xcel primarily uses your personal data so it can provide you with the services you've requested, whilst also managing our relationship with you. We also use your personal data for some other purposes, which may include the following:

### To communicate with you by:

- providing you with the information you've requested from us or alternatively, information we are required to send to you.
- Sending operational communications, these can include requests for information about order processing, security logins and password updates, or assistance with using our services generally.
- Sending marketing communications, about Xcel and its new or improved products or services we think you might be interested in.

### To support you:

This may include assisting with the resolution of a technical support issues or other issues relating our IT platform, website or our services generally, whether by email, phone support or otherwise.

### To analyse, aggregate and report:

We may also use the personal data we collect about you to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

### How we could share your data

There will be times when we may need to share your personal data with third parties. We will only disclose your personal data to:

- other companies in the Xcel group of companies
- third party service providers and partners who assist and enable us to use the personal data to support the delivery of or provide functionality for our services.
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.
- other people where we have your consent.

### Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it which can include situations like our providing you with a service you've requested or to comply with any applicable legal, tax or accounting requirements. We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it as outlined in the paragraph above. Following that period, we'll make sure it's deleted or anonymised.

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### Your rights

Because it's your personal data, you have certain rights. When it relates to marketing communications, you can simply ask us not to send it to you at any time, just follow the unsubscribe instructions contained in the marketing communication.

### You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it.
- object to our continued processing of your personal data You can exercise these rights at any time by making a request from the Privacy at Xcel page.
- In the event that you're not happy with how we are processing your personal data, please let us know by getting in touch via email so we can review and investigate your complaint, and try to get back to you within a reasonable time frame.