Privacy Policy

Insurgent Ventures II A/S (“IV”), CVR 43070320 (“we” or “us”), operates https://xqsvoucher.co.uk (the“Site”). This Privacy Policy gives you information about how we collect and use your personal data when you visit the Site, register with us, sign up to our newsletter, purchase products from us, participate in our events or promotions (including voucher promotions accessed via QR codes in partner stores), or interact with us via social media.

Which personal data and why?

In order to view information on our products and promotions, and to order products on the Site, you must register with your name, address, e-mail address, phone number (contact information) and payment details used to purchase our products, such as credit/debit card number and expiry date. We also collect details of your marketing and communication preferences and information to help us determine what products may be of interest to you.

When you visit the Site, we collect technical information about your IP address. Note that certain other companies than IV also collect your IP address when you visit the Site, in connection with the use of third-party cookies. How this occurs, and how you can go about limiting or turning off cookies in your web browser, is described in our cookie policy.

When you scan a QR code in a partner store to claim a voucher, we collect your e-mail address, mobile phone number, information needed to verify your age, your acceptance of the promotion terms, and whether your voucher was delivered and redeemed.

We will use your personal data for the following purposes: To provide you with the information and marketing materials on our products, to run our promotions, to complete your order and deliver our products, including shipping the products to you, and to notify you about changes to our products and services. For voucher promotions, we use your personal data to verify your age where required, deliver your voucher, administer the promotion (including preventing fraud and misuse) and handle complaints, and, if you opt in, to send you marketing by e-mail and SMS.
We may also process personal data to comply with applicable data protection rules, compliance with e-commerce laws and our legitimate interests, such as documentation, implementing and maintaining technical and organizational security measures, handling requests and complaints from you and others, investigating and reporting suspected security breaches in order to establish, enforce or defend legal claims, handling inspections and requests from regulatory authorities, handling disputes with you and third parties, preventing misuse and in having a properly functioning Site, and analyzing sales statistics to improve our marketing and sales efforts.

The purposes of us processing your IP address are to prevent infringements, incidents and other misuse of our services on the Site, to run statistics on users to the Site and to update and improve the Site.

Our legal basis for this processing is to ensure (i) the performance of the contract with you, including the promotion terms and conditions you accept when you claim a voucher, which is our legal basis for delivering your voucher and administering your participation in our voucher promotions; (ii) our or third-party legitimate interests, including ensuring that our promotions are only made available to adults aged 18 or over by verifying your age, and preventing fraud and misuse, provided, however, that it is necessary for these purposes and those interests are not overridden by the interests and fundamental rights and freedoms of data subject which require personal data protection; (iii) our legal obligation we are subject to, including where applicable law requires us to

verify age. The legal basis for processing of your personal data for direct marketing purposes, including marketing by e-mail and SMS, is based on (iv) your consent that has been given to us. You may withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

How long do we save your data?

We save your IP-address and other personal data as stated above for the time necessary for the purposes described above. We may also save your personal data for a longer time, if it is necessary to fulfill a legal obligation that requires processing in accordance with applicable laws, or so that we can establish, enforce, or defend legal claims.
We keep personal data from our voucher promotions for up to 12 months after the promotion ends, after which it is deleted by us and by our promotion partners, unless you have consented to marketing, in which case we keep your contact details until you withdraw your consent.

Who do we share your personal data with?

IV may share your personal data with other companies within the Scandinavian Tobacco Group ("STG") group of companies, as well as with collaborating partners, for example when providing IT services. These recipients only process your personal data on our behalf and in accordance with our instructions. IV takes all appropriate legal, technological and organizational measures to ensure that your personal data is processed securely, and with an adequate level of security when transferring to, or sharing with, selected recipients of this kind.
For our voucher promotions, we share your personal data with our promotion partner PayPoint and with service providers that help us run the promotion, such as providers of IT, age verification, messaging and voucher redemption services, to the extent needed to deliver and validate your voucher. Paypoint process your personal data only on our behalf and in accordance with our instructions.

Paypoint may share your personal data with government agencies if we are obligated under the law to do so, or on suspicion of criminal activity.

Where do we process your personal data?

Your personal data will primarily be processed within the UK and the EU/EEA. We may share your personal data with other companies within the STG group of companies, as well as with collaborating partners, for example when providing IT and subscription services. These recipients only process your personal data on our behalf and in accordance with our instructions. IV will only transfer your personal data to a country outside the UK when there are legal grounds to do so and sufficient guarantees that your personal data will be handled lawfully, such as UK adequacy regulations or the UK International Data Transfer Agreement or Addendum. In such cases, IV will take all appropriate legal, technological and organizational measures to ensure that your personal data is processed securely, with a level of protection comparable to that offered within the UK. You can request a copy of the relevant safeguards by contacting us.

How do we protect your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. Those measures may include, where appropriate, encrypting and pseudonymizing personal data, ensuring confidentiality, integrity, availability and resilience of its systems and services, ensuring that availability of and access to personal data can be restored in a timely manner after an incident, as well as regularly assessing and evaluating the effectiveness of such technical and organizational measures.

We have put in place procedures to deal with any suspected personal data breach and will notify you and/or any applicable data protection authority of a breach where we are legally required to do so.

WHAT ARE YOUR RIGHTS?

You have certain specific legal rights that you can enforce against us. A summary of these rights follows below.

Right to access/extracts from the register. You have the right to know what personal data about you we are processing. Upon request from you, we will provide you with information in writing about our processing of your personal data.

Right to data portability. You have the right to request a copy of the personal data you have provided to us in a structured, commonly used and machine-readable format. Where it is technically feasible, you also have the right to request that we transfer this personal data to another controller. The right to data portability applies to personal data that is processed via automated means and is based on a contract with you or your consent.

Correction of erroneous information. You have the right to request that we correct erroneous or incomplete information about yourself.

Deletion of certain data. You have the right to request that we delete your personal data under certain conditions, for example if your personal data is no longer necessary for the purpose for which we collected the data, if the processing is based on your consent and you have withdrawn such consent, if you object to a weighing of legitimate interests we have carried out and support for our legitimate interest is lacking, if your personal data was processed in an unlawful manner or if your personal data has to be deleted in order to fulfill a legal obligation.

In certain cases, we must save your personal data despite your request owing to legal requirements such as accounting and tax legislation, or for example if we need to retain certain data in order to establish, enforce or defend a legal claim.

Right to restrict processing of your personal data. You have the right to demand a restriction on our processing of your personal data in certain cases. If, for example, you have contested the fact that your personal data is correct, you can request a restriction on processing for a period of time that will give us the opportunity to check if your personal data is correct.

Right to object to our processing of personal data. You have the right, under certain conditions, to object to our processing of your personal data. You have the right at any time to object to processing of your personal data for direct marketing purposes, including profiling related to such marketing. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking unsubscribe at the bottom of the emails we send to you for marketing purposes, replying STOP to our marketing SMS messages, or contacting us using the details below. You have the right to object to processing that is based on the legal grounds of our legitimate interest. However, we may continue processing your data despite your objection to the processing if we have compelling legitimate reasons for the processing that outweigh your privacy interests.

Right to withdraw your consent. Where we process your personal data based on your consent, such as for marketing by e-mail and SMS, you may withdraw your consent at any time, in the same ways as described above. Withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal.

CONTACT AND QUESTIONS

If you have any questions regarding our processing of your personal data, or if you would like to present a request about an excerpt from the registry, data portability, correction or deletion – or present an objection, a restriction or a withdrawal of your consent – please contact us at:

Insurgent Ventures II A/S
Sandtoften 9, DK-2820 Gentofte
Denmark
E-mail: mydata@st-group.com
Telephone: +45 39 55 62 00

You may also contact us via: Address 38-40 The Maltings, St Albans, Hertfordshire AL1 3HL, reece.raulet@st-group.com.

COMPLAINTS

If you have a complaint regarding IV's processing of your personal data, you have the right to submit such complaints at any time 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.