

TOTALLY PRIVACY STATEMENT

1. Introduction

This Privacy Statement explains how Totally Rewards Ltd. ("we," "us," or "our") collects, uses, and protects personal information. We are committed to protecting your privacy and handling your data in an open and transparent manner.

This statement covers our role as both a Data Controller (when we collect data for our own purposes, such as through our website and marketing) and as a Data Processor (when we handle data on behalf of our business customers to provide our services).

Contact details:

Totally Rewards Ltd.

Kemp House, 152–160 City Road, London, England, EC1V 2NX

Email: support@totallyrewards.com

2. Our Role in Data Processing

- As a Data Controller: We act as a controller when we collect personal data directly from you for our own business purposes. This includes information from visitors to our website, marketing contacts, and representatives of our business customers.
 - As a Data Processor: We act as a processor when we provide our gift card services to our business customers (the "Controller"). In this role, we process data strictly in line with our customers' instructions and our contractual obligations.
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3. Information We Process as a Data Processor

When providing services on behalf of our business customers, they remain the Data Controller. We process only the data necessary to fulfil our contractual obligations, which may include:

- Email address: To deliver digital gift cards.
- IP address: For security, fraud prevention and redemption monitoring.

If you have received a gift card fulfilled by Totally Rewards and have questions about your personal data, please contact the organisation that issued the gift card. They are the Data Controller responsible for your data.

4. Information We Collect as a Data Controller

When you interact with our website or conduct business with us, we may collect:

- Contact information: Name, email address, phone number, and company name.

- Technical information: IP address, browser type and operating system, collected via cookies or similar technologies.
- Marketing information: Preferences and communication history if you engage with our campaigns.

5. How We Use Your Information (as a Data Controller)

We process your data only where we have a lawful basis under Article 6 of the UK/EU GDPR.

Purpose	Legal Basis
Responding to your enquiries or requests	Legitimate interests (to respond to business enquiries)
Managing customer relationships	Performance of a contract
Sending marketing communications	Consent or legitimate interests (if you are an existing customer or business contact)
Operating and improving our website	Legitimate interests
Fulfilling legal or regulatory obligations	Legal obligation

You can withdraw consent for marketing at any time by clicking “unsubscribe” in our emails or contacting us directly.

6. Data Sharing and International Transfers

We do not sell your personal data. We may share it only:

- With sub-processors: We use trusted service providers (such as cloud hosting, email delivery) under contracts that ensure equivalent data protection.
- For international transfers: Our systems are primarily hosted in the UK and Europe. For escalated support, some technical staff in Serbia may access data under strict security controls. We use the EU Standard Contractual Clauses and the UK International Data Transfer Addendum to ensure compliant transfers.
- To meet legal obligations: We may disclose data where required by law or court order.

A list of sub-processors is available on request.

7. Cookies and Similar Technologies

Our website uses cookies to enhance user experience, analyse traffic, and deliver relevant content. Non-essential cookies are used only with your consent. You can manage cookie preferences via your browser settings or our cookie banner.

For more details, please see our Cookie Policy.

8. Data Security

We implement appropriate technical and organisational measures to safeguard personal data, including:

- Encryption of data in transit and at rest.
 - Access controls ensuring only authorised personnel can view personal data.
 - Regular staff security training.
 - Secure network and data centre protections.
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9. Data Retention

- As a Processor: We retain personal data only for the period agreed with our business customers.
 - As a Controller: We retain personal data only as long as necessary to fulfil the purpose for which it was collected or as required by law.
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10. Your Data Protection Rights

Under UK and EU GDPR, you have the right to:

- Access your personal data.
- Correct any inaccuracies.
- Request erasure of your data ("the right to be forgotten").
- Object to or restrict processing.
- Receive your data in a portable format.

To exercise these rights, contact us at support@totallyrewards.com.

If your request concerns data processed on behalf of one of our business customers, please contact that client directly (they are the Data Controller).

If you are not satisfied with our response, you may contact the Information Commissioner's Office (ICO) at www.ico.org.uk or your local supervisory authority in the EU.

11. Changes to This Privacy Statement

We may update this statement from time to time. Any material changes will be posted on this page with a revised effective date.

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