

PRIVACY POLICY

FROSTBOUND LTD.



Effective Date: 22 November 2024

Reviewed By: Managing Director

1. Introduction

Frostbound Ltd. ("Frostbound", "we", "our" or "the Company") is a company limited by shares, incorporated under the Companies Act 2006 in England and Wales. This Privacy Policy constitutes a binding internal instrument of corporate governance and data processing control, issued in compliance with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant subordinate legislation and ICO guidance.

As a luxury apparel enterprise with cross-border operations, e-commerce interfaces, and fulfilment processes involving third-party logistics and professional intermediaries, Frostbound acknowledges its duties as a data controller and undertakes to discharge such duties in a manner consistent with lawful processing, accountability, and commercial probity.

2. Corporate Data Controller Identity

Frostbound Ltd. is the registered data controller with respect to all personal data processed under this Policy. Its principal place of business and correspondence address is 11 Freddie Steele Street, Stoke on Trent, ST4 4FG. For the purpose of UK GDPR compliance and Article 30 documentation, data protection oversight is assigned to the Company's appointed executive contact: dataprotection@frostbound.co.uk. Frostbound Ltd. is not yet registered with the Information Commissioner's Office (ICO). Registration shall be completed in accordance with statutory requirements prior to any processing of personal data at scale or any international transfer involving non-adequacy jurisdictions..

3. Legal Basis for Processing and Purposes

Personal data shall be processed by the Company only where a valid legal basis under Article 6 of the UK GDPR is engaged. These include (but are not limited to):

- The necessity of processing for the performance of a contract;
- Compliance with legal and statutory obligations;
- The pursuit of legitimate interests not overridden by the rights and freedoms of the data subject;
- Consent, where such consent is freely given, specific, informed and unambiguous.

Purposes of data processing shall include, without limitation:

- Processing of orders, confirmations, billing, fulfilment and returns;
- Maintenance of transaction records, VAT compliance, and fraud prevention;
- Marketing communications (subject to opt-in consent and PECR compliance);
- Analytics relating to website performance, customer behaviour, and product refinement;

- Supplier management and commercial liaison documentation.

4. Categories and Types of Data

The Company processes the following categories of data:

- Personal identifiers: name, address, contact details, and account reference;
- Transactional data: orders placed, returns made, fulfilment status;
- Payment and billing data: encrypted tokenised information only (no card data stored);
- Technical data: IP addresses, session cookies, user-agent identifiers;
- Communications data: correspondence, preferences, and recorded opt-ins;
- Supplier-related personal information: authorised signatories and contact personnel.

No sensitive or special category personal data shall be collected except where legally required and with suitable safeguards.

5. Disclosure to Third Parties and Transfer Controls

The Company does not share personal data outside the lawful boundaries established by the UK GDPR. Data is disclosed strictly on a need-to-know basis, subject to contractually binding terms with:

- Fulfilment and logistics partners, for delivery and returns;
- Payment service providers, for secure processing;
- External advisors, auditors, or legal counsel, under confidentiality;
- Regulatory and public authorities where disclosure is required by law.

Cross-border transfers outside the United Kingdom shall only occur where there are adequacy decisions, binding corporate rules, or ICO-compliant safeguards in place, including the UK International Data Transfer Agreement (IDTA) or SCCs.

6. Data Minimisation and Retention

The Company adheres to the principles of data minimisation and purpose limitation. Data shall not be retained beyond the period reasonably necessary to satisfy the purpose for which it was collected, save where longer retention is mandated by law or necessary for the establishment, exercise or defence of legal claims.

Standard retention periods:

- Transactional records: 6 years (Companies Act 2006 and HMRC);
- Customer correspondence and queries: 24 months;

- Email marketing records: until withdrawal of consent or inactivity beyond 24 months.

7. Data Subject Rights

All data subjects are entitled to exercise their rights under the UK GDPR, including:

- The right to access and obtain a copy of their data;
- The right to rectification of inaccurate or incomplete data;
- The right to erasure ('right to be forgotten') in lawful circumstances;
- The right to restrict processing or object to processing;
- The right to data portability in applicable scenarios;
- The right to withdraw consent at any time.

Requests shall be submitted in writing to dataprotection@frostbound.co.uk and acknowledged within the timeframes prescribed by law.

8. Security Measures and Breach Response

The Company shall implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and accidental loss, destruction or damage. These shall include:

- Encrypted HTTPS protocols on all digital platforms;
- Secure storage and access control with audit capabilities;
- Multi-factor authentication for administrator access;
- Regular review of third-party processor agreements and security standards.

Any data breach that may affect individuals' rights and freedoms shall be reported to the ICO within 72 hours, and to affected individuals where required.

9. Cookies and Analytical Tracking

Frostbound Ltd. uses cookies on its website for functional purposes, analytics, and performance enhancement. No non-essential cookies shall be deployed without the user's prior consent in accordance with PECR.

10. Versioning, Review and Policy Amendment

This Policy shall be reviewed annually by the Managing Director and Company's Legal Counsel, or sooner where necessitated by legislative or operational change. Any substantive amendments shall be notified to stakeholders via publication or direct notice.

This Policy supersedes all prior statements regarding data protection and privacy and is enforceable as a matter of contract and compliance protocol.

Authorised by Order of the Board
Frostbound Ltd.
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Not Yet Registered
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