

Pack-A-Punch PCs Ltd

Privacy Policy

Last updated: [DATE] 2026 | Version 4 (Revised)

Pack-A-Punch PCs Ltd ("we", "us", "our") is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains what personal data we collect about you, why we collect it, how we use it, and your rights under UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Please read this policy carefully before using our website or placing an order. By using our website or purchasing from us, you acknowledge that you have read and understood this policy.

1. Who We Are

1.a Pack-A-Punch PCs Ltd is the data controller responsible for your personal data. We are registered in England and Wales under Company Number 16316337.

1.b Our registered address is: [REGISTERED ADDRESS — INSERT BEFORE PUBLISHING].

1.c You can contact us regarding any data protection matter by email at: info@packapunchpcs.com, or by post to the address above.

1.d We will assess whether we are required to pay the ICO data protection fee and, where legally required, we will register with the Information Commissioner's Office and pay the appropriate fee. Our ICO registration details, if applicable, will be available on the ICO public register at ico.org.uk. We recommend completing the ICO fee self-assessment at ico.org.uk/registration prior to launch.

2. What Personal Data We Collect

We collect the following categories of personal data, depending on how you interact with us:

2.1 Data You Provide to Us Directly

2.1.a Identity data: your full name.

2.1.b Contact data: your email address, telephone number, and delivery/billing address.

2.1.c Order data: details of the products you purchase, build specifications you request, order history, and correspondence regarding your order.

2.1.d Payment data: we do not store your full card details. Card payments are processed securely by Stripe, and bank transfer payments are processed directly via your own banking provider. We retain only the information required to reconcile your payment (such as last four digits of card, transaction reference, or bank transfer reference).

2.1.e Communications data: any messages, emails, or enquiries you send us, including custom build requests.

2.1.f Buy Now Pay Later data: if you use Klarna to finance your purchase, Klarna will collect and process your financial data directly under their own privacy policy. We receive only the confirmation that payment has been authorised.

2.2 Data We Collect Automatically

2.2.a Technical data: your IP address, browser type and version, operating system, device type, and time zone.

2.2.b Usage data: pages you visit on our website, products you view, links you click, referral source, and session duration.

2.2.c Cookie data: we use cookies and similar tracking technologies on our website. Please see Section 9 (Cookie Policy) for full details.

2.3 Data We Do Not Collect

2.3.a We do not collect any special category personal data (such as health, ethnicity, religion, or biometric data). Our products and services are intended for customers aged 18 or over, and we do not knowingly collect children's personal data for marketing purposes. If you are a parent or guardian and believe a child has submitted personal data to us, please contact us at info@packapunchpcs.com.

3. How and Why We Use Your Personal Data

Under UK GDPR, we must have a lawful basis for processing your personal data. The table below sets out the purposes for which we use your data and the lawful basis for each:

Purpose	Data Used	Lawful Basis
Processing and fulfilling your order	Identity, contact, order, payment data	Performance of a contract (Article 6(1)(b) UK GDPR)
Communicating with you about your order, including build updates and delivery notifications	Identity, contact, order data	Performance of a contract (Article 6(1)(b))
Processing payment and preventing fraud	Identity, contact, payment data	Performance of a contract; Legitimate interests (fraud prevention) (Article 6(1)(b) and (f))
Providing customer support and responding to enquiries	Identity, contact, communications data	Performance of a contract; Legitimate interests (Article 6(1)(b) and (f))
Sending you marketing emails about our products and offers (only if you have opted in)	Identity, contact data	Consent (Article 6(1)(a) UK GDPR)
Improving our website and understanding how customers use it (via Google Analytics)	Technical, usage, cookie data	Legitimate interests (Article 6(1)(f)) for analysing website performance, subject to your consent for any non-essential analytics cookies where required under PECR
Complying with legal obligations	Identity, contact, order, payment	Legal obligation (Article 6(1)(c))

(e.g. tax records, consumer law)	data	UK GDPR)
Keeping records of transactions for accounting and warranty purposes	Identity, order, payment data	Legal obligation; Legitimate interests (Article 6(1)(c) and (f))

3.a We will only use your personal data for the purposes for which it was collected. If we need to use it for a materially different purpose, we will notify you and, where required, obtain your consent.

3.b You may withdraw consent for marketing emails at any time by clicking the unsubscribe link in any marketing email, or by contacting us at info@packapunchpcs.com. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

4. Who We Share Your Data With

We do not sell, rent, or trade your personal data. We share your data only where necessary with the following trusted third parties, all of whom are bound by their own data protection obligations:

4.a Stripe (payment processing): when you pay by card, your payment details are submitted directly to Stripe, Inc. Stripe is a PCI-DSS compliant payment processor. Their privacy policy is available at stripe.com/gb/privacy.

4.b Klarna (buy now, pay later): if you choose Klarna as a payment method, your data is shared with Klarna Bank AB as required to facilitate the financing agreement. Their privacy policy is available at klarna.com/uk/privacy.

4.c Delivery and courier partners: we share your name, delivery address, and contact details with our chosen courier(s) in order to deliver your order. The specific courier used will depend on your location and order size, and will be disclosed at the point of dispatch.

4.d Website platform provider: our website is hosted on [PLATFORM — e.g. Shopify / WooCommerce]. They process data on our behalf as a data processor under a data processing agreement. Their privacy policy governs the infrastructure-level handling of your data.

4.e Email marketing platform: if you have opted in to marketing communications, your name and email address are stored in our email marketing platform ([PLATFORM — e.g. Mailchimp / Klaviyo]). You may unsubscribe at any time.

4.f Google Analytics: we use Google Analytics to understand how visitors use our website. Google Analytics collects usage information about how visitors interact with our website. We configure Google Analytics with privacy-focused settings, including IP anonymisation where available, to minimise the personal data collected. Google may process this data on servers outside the UK — see Section 7 for further details.

4.g Legal and regulatory authorities: we may disclose your data to HMRC, courts, law enforcement, or other authorities where required to do so by law or to protect our legal rights.

4.h Professional advisers: our accountants, legal advisers, and insurers may have access to relevant personal data where necessary to provide their services, subject to confidentiality obligations.

5. How Long We Keep Your Data

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by law. Our standard retention periods are:

5.a Order and transaction records (including invoices, customer name, address, order details, and payment references): retained for up to 7 years for tax, accounting, legal, and audit purposes. This reflects standard UK practice for financial and business records, which are generally required to be kept for at least 6 years from the end of the relevant accounting period.

5.b Warranty and after-sales records: for the duration of any applicable warranty period plus 1 year thereafter.

5.c Customer communications and support records: 3 years from the date of the last communication.

5.d Marketing data (where consent given): until you withdraw consent or we determine the data is no longer accurate or relevant, whichever is sooner. We review our marketing lists at least annually.

5.e Website analytics data (via Google Analytics): governed by Google Analytics' own retention settings, which we configure in line with our legitimate interests. We use a standard retention period of 14 months.

5.f Abandoned basket or enquiry data: 12 months from the date of enquiry or abandonment, after which it is deleted.

5.g When data is no longer required, it is securely deleted or anonymised so that it can no longer be associated with you.

6. How We Keep Your Data Secure

6.a We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

6.b These measures include: use of HTTPS/SSL encryption on our website; access controls limiting who within our business can access personal data; secure password practices; and use of reputable, industry-standard third-party platforms for payment processing and data storage.

6.c We do not store full card payment details on our own systems at any point. All card data is handled exclusively by Stripe, which operates to PCI-DSS Level 1 standards.

6.d In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours of becoming aware of it, and will notify you directly where required.

6.e While we take all reasonable steps to protect your data, no transmission of data over the internet is completely secure. You submit your data at your own risk, and we cannot guarantee the security of data transmitted to our website.

7. International Data Transfers

7.a Some of our third-party service providers, including Google (Google Analytics) and Stripe, may process your data outside the United Kingdom or the European Economic Area (EEA).

7.b Where this occurs, we ensure that appropriate safeguards are in place in accordance with UK GDPR, including reliance on UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other lawful transfer mechanisms recognised under UK data protection law.

7.c We do not specify the precise transfer mechanisms used by each of our service providers, as these are governed by their own data protection arrangements. We encourage you to review the privacy policies of Stripe, Google, and other third parties listed in Section 4 for full details of how they handle international transfers.

7.d You can request further information about the specific safeguards applicable to transfers of your data by contacting us at info@packapunchpcs.com.

8. Your Rights Under UK GDPR

Under UK GDPR, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to exemptions in certain circumstances:

8.a Right of access: you have the right to request a copy of the personal data we hold about you (known as a Subject Access Request or SAR). We will respond within one month of receiving your request.

8.b Right to rectification: you have the right to ask us to correct any inaccurate or incomplete personal data we hold about you.

8.c Right to erasure ("right to be forgotten"): you have the right to ask us to delete your personal data where it is no longer necessary for the purposes for which it was collected, or where you withdraw consent and no other lawful basis applies. Note that we may be required to retain certain data for legal reasons (e.g. HMRC records) even following such a request.

8.d Right to restrict processing: you have the right to ask us to pause processing of your data in certain circumstances, for example while we investigate a complaint about accuracy.

8.e Right to data portability: where we process your data by automated means on the basis of your consent or a contract, you have the right to receive your data in a structured, commonly used, machine-readable format.

8.f Right to object: you have the right to object to our processing of your data where we rely on legitimate interests as our lawful basis. You also have an absolute right to object to processing for direct marketing purposes at any time.

8.g Rights in relation to automated decision-making: we do not make decisions about you based solely on automated processing that produce legal or similarly significant effects.

8.h To exercise any of the above rights, please contact us in writing at info@packapunchpcs.com or by post to our registered address. We may need to verify your

identity before processing your request. There is no charge for exercising your rights in most circumstances.

8.i Right to complain: if you are unhappy with how we have handled your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113. We would, however, welcome the opportunity to address your concerns directly before you contact the ICO.

9. Cookie Policy

9.a Our website uses cookies — small text files placed on your device — to improve your experience and help us understand how the site is used. We use the following categories of cookies:

- **Strictly necessary cookies:** essential for the website to function. These include session cookies, shopping basket cookies, and security cookies. These cannot be disabled as they are required for the site to operate.
- **Analytics cookies:** We use Google Analytics to understand how visitors interact with our website, such as pages visited, time on site, and referral source. These cookies are only set with your consent, which we obtain via our cookie consent banner on your first visit. We configure Google Analytics with privacy-focused settings where available to minimise the personal data collected.
- **Functional cookies:** these remember your preferences (e.g. saved basket, recently viewed products) to improve your experience. These are set only with your consent.
- **Marketing cookies:** We do not currently use marketing or advertising cookies. If this changes in the future, we will update this policy and request your consent before setting any such cookies.

9.b You can manage or withdraw your cookie consent at any time via the cookie settings on our website. You can also control cookies through your browser settings, though disabling certain cookies may affect the functionality of the website.

9.c Google Analytics cookies are set by Google LLC. You can opt out of Google Analytics tracking across all websites by installing the Google Analytics Opt-out Browser Add-on available at tools.google.com/dlpage/gaoptout.

9.d For more information about cookies and how to manage them, visit allaboutcookies.org.

10. Marketing Communications

10.a We will only send you marketing emails if you have expressly opted in to receive them, either at the point of purchase or via a sign-up form on our website. We will never add you to our marketing list without your consent.

10.b Our marketing emails may include information about new products and builds, promotions and discounts, company news and updates, and PC building tips and guides.

10.c You can unsubscribe from marketing emails at any time by clicking the unsubscribe link at the bottom of any marketing email, or by emailing us at info@packapunchpcs.com. We will process your request as soon as reasonably practicable and within 10 working days at the latest.

10.d Please note that unsubscribing from marketing communications does not unsubscribe you from transactional emails relating to your orders, which we must send in order to fulfil our contractual obligations to you.

10.e We use [EMAIL PLATFORM — e.g. Mailchimp / Klaviyo] to manage our email marketing. Your name and email address are stored on their platform. You can request deletion of your marketing data at any time by contacting us.

11. Children's Privacy

11.a Our products and services are intended for customers aged 18 or over. We do not knowingly sell directly to children or collect personal data from children for marketing purposes. If we become aware that a child under the age of 18 has provided us with personal data without appropriate parental or guardian involvement, we will take reasonable steps to delete that data. If you are a parent or guardian and have concerns, please contact us at info@packapunchpcs.com.

11.b Where an order is placed by an adult on behalf of a household including minors, only the adult's personal data is collected and processed.

12. Third-Party Links

12.a Our website may contain links to third-party websites, including manufacturer websites, review platforms, and social media platforms. These links are provided for your convenience and information only. We have no control over the content or privacy practices of those websites and accept no responsibility for them. We encourage you to review the privacy policy of any third-party site you visit.

13. Changes to This Privacy Policy

13.a We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or for other operational reasons. When we make material changes, we will update the "Last updated" date at the top of this policy and, where appropriate, notify you by email.

13.b We encourage you to review this policy periodically. Your continued use of our website following any changes constitutes your acknowledgement of the updated policy.

13.c Previous versions of this policy are available on request by contacting info@packapunchpcs.com.

14. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or how we handle your personal data, please contact us:

- Email: info@packapunchpcs.com
- Post: Pack-A-Punch PCs Ltd, [REGISTERED ADDRESS — INSERT BEFORE PUBLISHING]
- Website: packapunchpcs.com

We aim to respond to all data protection enquiries within 5 working days.

INTERNAL DRAFT ONLY — DO NOT PUBLISH IN THIS FORM. Before publishing: (1) complete all [BRACKETED] placeholders; (2) complete ICO fee self-assessment at ico.org.uk/registration; (3) confirm which tools and platforms are live and remove or update any sections that do not apply; (4) remove this note, the “INTERNAL USE” header label, and the “Version 4 (Revised)” subtitle from the published version; (5) a solicitor review is recommended. Pack-A-Punch PCs Ltd — Company No. 16316337.