

# Products Privacy Notice

## 1. Introduction

1.1. dunnhumby Limited (referred to in this Privacy Notice as “dunnhumby”, “we”, “us” or “our”) respects your right to privacy.

1.2. This Privacy Notice:

1.2.1.applies to personal data that we collect through your use of our products and platforms listed in Annex 1 (together the “Products & Platforms”);

1.2.2.explains how we collect, use, share and retain personal data about you as an authorised user of our Products & Platforms (“you”);

1.2.3.explains how you can exercise your rights in respect of the personal data we process about you from your use of our Products & Platforms; and

1.2.4.applies only to the Products & Platforms that your employer/engager has access to under its contract with us. The specific features, functionality and data processing activities that apply to you will therefore depend on the Products & Platforms contracted by your employer/engager and how you use them.

1.2.5.dunnhumby Products & Platforms are data-driven tools that give our clients (your employer/engager) clear insights into their business and customer behaviour. Depending on what your employer/engager has contracted, you may access dashboards, reports or analytics features designed to support better commercial decisions.

1.2.6.If you have any questions or concerns about our use of your personal data, then please contact us using the information under the “How to contact us” heading below.

1.3. This Privacy Notice does not apply to:

1.3.1.information about consumers who purchase products or services from dunnhumby clients. Any information provided to our clients through our Products & Platforms is provided in aggregate form only and does not identify individual consumers;

1.3.2.information about consumers who purchase products or services from Walmart. See the [Walmart Privacy Policy](#) for information on how Walmart collects, uses, and shares your personal data when you purchase products or services from them.

## 1.4. What does dunnhumby do?

1.4.1.dunnhumby is a customer data science company, headquartered in the UK but with group companies all around the world. Our Products & Platforms and other services help retailers and brands analyse data to inform business strategy, improve customer experiences and build loyalty.

1.4.2.For more information about dunnhumby, please see the “About Us” section of our website ([available here](#)).

## 2. Quick links

- 2.1 We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link in the table below to jump to that section.

Section
1. <a href="#">Introduction</a>
2. <a href="#">Quick links</a>
3. <a href="#">Personal data we collect about you</a>
4. <a href="#">How we use personal data and our legal basis for processing it</a>
5. <a href="#">Marketing</a>
6. <a href="#">Who does dunhumby do we share my information your personal data with?</a>
7. <a href="#">How we protect your personal data</a>
8. <a href="#">International data transfers</a>
9. <a href="#">Data retention</a>
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13. <a href="#">How to Contact Us</a>
14. <a href="#">Data Controller</a>
15. <a href="#">Additional Information</a>
16. <a href="#">Annex 1: Relevant Products &amp; Platforms</a>

## 3. Personal data we collect about you

- 3.1. Our Products & Platforms only process personal data relating to individuals who work for our clients and act as authorised users of dunhumby Products & Platforms (referred to in this Privacy Notice as “users”).
- 3.2. If you are a user of dunhumby Products & Platforms, we may collect the following information about you.

3.3. Some of this information may be collected automatically using cookies and similar tracking technologies. For further information about the types of cookies we use, the purposes for which we use them, and how you can manage or control your cookie preferences, please see our [Cookie Notice](#).

Source of personal data	Category of personal data	Specific personal data included in this category
You or your employer/engager	<b>Identity and Contact</b>	<ul style="list-style-type: none"> <li>Identity: your first and last name, user ID and password for the Products &amp; Platforms;</li> <li>Contact: your work email address;</li> <li>Employer/engager: the name of your employer/engager; and</li> <li>Language: the language you wish to view the Products &amp; Platforms in.</li> </ul>
	<b>Where the Key Performance Report product is used: Payment Information</b>	<ul style="list-style-type: none"> <li>Payment information: including details of subscriptions, subscription amount, date of subscription and payment method.</li> </ul>
You	<b>Communication</b>	<ul style="list-style-type: none"> <li>Your communications with us in relation to the Products &amp; Platforms (including notes, e-mails and other messages between you and us relating to Products &amp; Platforms support or otherwise);</li> <li>Information about your employer/engager's sales history with us; and/or</li> <li>Any other information that you choose to provide to us.</li> </ul>
	<b>Research</b>	<ul style="list-style-type: none"> <li>Your responses to surveys we send to you and/or information related to your participation in any other market research.</li> </ul>
Collected automatically	<b>Device and Systems</b>	<ul style="list-style-type: none"> <li>IP address and time zone, device type, browser type and other technical information.</li> </ul>
	<b>Access, Application and Security Logs</b>	<ul style="list-style-type: none"> <li>The time you access or attempt to access the Products &amp; Platforms; and</li> <li>The operations you perform and options you choose when using the Products &amp; Platforms, including reports you generate, access and export.</li> </ul>
	<b>Location</b>	<ul style="list-style-type: none"> <li>General geographic location (e.g. country or city-level location only).</li> </ul>
	<b>Technical Information</b>	<ul style="list-style-type: none"> <li>Information shared with us by our third-party platform provider that will be used to provide technical support if, for example, you have raised a question through the chat support function or you require our help when using the Products &amp; Platforms.</li> </ul>
	<b>Usage</b>	<ul style="list-style-type: none"> <li>Your preferences and data observed or collected about you in connection with your use of the Products &amp; Platforms (this may include unique tracking IDs,</li> </ul>

		browsing activity, pageviews, aggregated usage insights, and events on our Products & Platforms).
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## 4. How we use personal data and our legal basis for processing it

4.1. We rely on the following legal bases to use your personal data for the following purposes:

Source of personal data	Purpose	Personal data processed	Legal basis
You or your employer/engager	<ul style="list-style-type: none"> <li>To register you as a user of our Products &amp; Platforms;</li> <li>To allow you to connect to and use our Products &amp; Platforms;</li> <li>To process payments in respect of your subscription where you use the Key Performance Report product;</li> <li>To provide certain functionality of the Products &amp; Platforms to you.</li> </ul>	<ul style="list-style-type: none"> <li>Identity and Contact;</li> <li>Payment Information;</li> <li>Device and Systems;</li> <li>Location</li> </ul>	Necessary for the performance of our contract with your employer/engager and to provide the Products & Platforms to you/your employer/engager
	<ul style="list-style-type: none"> <li>To manage your access to our Products &amp; Platforms;</li> <li>To provide you with help and support in using our Products &amp; Platforms;</li> <li>To provide user guides and education;</li> <li>To respond and deal with your queries or comments;</li> <li>To email you with notifications about your use of our Products &amp; Platforms, such as when reports are ready for you to view;</li> <li>To enable you access to reports or other documents available on our Products &amp; Platforms;</li> <li>To send you user feedback surveys or invite you to participate in other market research;</li> </ul>	<ul style="list-style-type: none"> <li>Identity and Contact;</li> <li>Communication;</li> <li>Device and Systems;</li> <li>Access, Application and Security Logs;</li> <li>Research;</li> <li>Usage</li> </ul>	Legitimate interests

	<ul style="list-style-type: none"> <li>To assess the results of the surveys you complete or your participation in any other market research;</li> <li>To send you service communications containing important information relating to the Products &amp; Platforms or your use of the Products &amp; Platforms;</li> <li>To send marketing messages to you which we think you (in your business or professional capacity) or your employer/engager may be interested in.</li> </ul>		
	<ul style="list-style-type: none"> <li>To comply with the law;</li> <li>To exercise, establish or defend our legal rights;</li> <li>To protect the rights, property, or safety of dunnhumby or others;</li> <li>To notify you about changes to our Privacy Notices, Cookie Notice or Terms and Conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Identity and Contact;</li> <li>Communication;</li> <li>Payment Information;</li> <li>Access</li> <li>Application and Security Logs</li> </ul>	Compliance with law
<b>You, collected automatically</b>	<ul style="list-style-type: none"> <li>To store your 'don't show this again' user preferences for pop-ups;</li> <li>For our internal analytics purposes and to improve the quality and relevance of our Products &amp; Platforms;</li> <li>To create management reporting about aggregated usage and performance of our Products &amp; Platforms;</li> <li>To provide you with certain functionality within our Products &amp; Platforms;</li> <li>To enhance the user experience, provide support, and improve the performance and security of our Products &amp; Platforms.</li> </ul>	<ul style="list-style-type: none"> <li>Identity and Contact;</li> <li>Device and Systems;</li> <li>Location;</li> <li>Technical Information;</li> <li>Usage</li> </ul>	Consent
	<ul style="list-style-type: none"> <li>To store your acceptance of the Portal Terms and</li> </ul>	<ul style="list-style-type: none"> <li>Identity and Contact;</li> </ul>	Legitimate interests

	<p>Conditions / Applicable Use Policy and your cookie preferences;</p> <ul style="list-style-type: none"> <li>• For network and information security purposes to enable us to verify your identity and access rights to the Portal;</li> <li>• To enhance the user experience, provide support, and improve the performance and security of our Products &amp; Platforms;</li> <li>• To automate the billing process through our corporate billing systems;</li> <li>• To identify performance issues and provide technical support.</li> </ul>	<ul style="list-style-type: none"> <li>• Payment Information;</li> <li>• Device and Systems;</li> <li>• Access, Application and Security Logs;</li> <li>• Location;</li> <li>• Technical Information;</li> <li>• Usage</li> </ul>	
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4.2. Where we have mentioned above that our use of your personal data is based on our “legitimate interests”, these interests are to:

4.2.1. improve our Products & Platforms;

4.2.2. service our clients’ needs, including delivering our Products & Platforms; and

4.2.3. protect and support our business.

4.3. Where your personal data is processed for any of the above purposes, such processing may be undertaken using artificial intelligence (“AI”). We use AI technology developed by trusted third parties as well as create our own, which may form part of the Products & Platforms. For example, various parts of our Products & Platforms use AI to make them more effective and ultimately more useful for you. questions about or need further information concerning the purposes for which we process, and the legal basis on which we collect and use information about you rely on to process, your personal data, please contact us using the contact details provided under the “How to contact us” heading below.

## 5. Marketing

5.1. Where we have your consent to do so (if required), we may contact you with information about dunnhumby’s global Products & Platforms and other services.

5.2. If you would like to opt-out of marketing emails, you can do this by:

5.2.1. clicking on the unsubscribe link in any marketing email you receive; or

5.2.2. updating your preferences in your account settings within the Products & Platforms.

## 6. Who do we share your personal data with?

6.1. We will only share personal data with the following categories of third parties:

- 6.1.1. other companies within the dunnhumby group who help us to provide our Products & Platforms to you, and they will only use the personal data for the purposes described in this Privacy Notice;
- 6.1.2. third party service providers who help us to provide our Products & Platforms (for example by hosting them, enabling certain features or functionality, or by providing other services such as support and maintenance, security technology, or helpdesk support).
- 6.1.3. The categories of third-party service providers we use to provide our Products & Platforms are listed below; however, the specific categories relevant to you will depend on the particular dunnhumby Products & Platforms that our client (your employer/engager) has contracted.

Third-Party Category	Reason for disclosure & personal data disclosed
Analytics Platforms	<ul style="list-style-type: none"> <li>• Used to improve platform performance and user experience.</li> <li>• May process unique tracking IDs, browsing activity, device data, location data, and aggregated usage insights.</li> </ul>
IT service providers.	<ul style="list-style-type: none"> <li>• Provide secure hosting, infrastructure and storage for dunnhumby Products &amp; Platforms. This includes cloud services, system tooling, productivity platforms and third-party AI technologies used to enable or enhance product functionality.</li> <li>• May host login details, usernames, language/email preferences or all categories of personal data depending on the Products &amp; Platforms.</li> </ul>
Help, Training & Guidance Providers	<ul style="list-style-type: none"> <li>• Deliver in-product help, learning content and guided tours.</li> <li>• With consent, where required, may collect usernames, interaction logs, training engagement, and help-feature usage metrics.</li> </ul>
Search & Advertising-Support Providers	<ul style="list-style-type: none"> <li>• Enable sponsored search functionality or product-level search operations.</li> </ul>
Business Intelligence & Reporting Platforms	<ul style="list-style-type: none"> <li>• Support visualisation and access to dashboards and reports.</li> <li>• May process usernames, device information, usage logs, login timestamps and report-access information.</li> <li>• Certain Products &amp; Platforms are built on the Now Strategy platform, a business intelligence software platform, allowing data to be visualised and accessed via the web and mobile platforms.</li> <li>• Now Strategy will have access to the following categories of personal data: your user identity information (i.e. username) and Access, Application and Security Logs.</li> </ul>
Deployment & Maintenance Providers	<ul style="list-style-type: none"> <li>• Provide platform deployment, maintenance, optimisation and operational support.</li> <li>• May access all categories of personal data necessary for technical maintenance.</li> </ul>

Authentication & Identity Management Providers	<ul style="list-style-type: none"> <li>• Support authentication, identity verification, and system logging.</li> <li>• May process login details, language/email preferences, usage data, device data and access logs.</li> </ul>
Marketing Automation Providers	<ul style="list-style-type: none"> <li>• Store contact information and employer/engager details to deliver permitted marketing communications.</li> </ul>
Payment Processing Providers	<ul style="list-style-type: none"> <li>• Process subscription or payment transactions.</li> <li>• May receive payment card information, billing address, and transaction data directly from the user.</li> </ul>
Customer Support & Service Management Providers	<ul style="list-style-type: none"> <li>• Manage support tickets, troubleshooting and client service interactions.</li> <li>• May process email addresses and any details included in a support request.</li> </ul>

- 6.1.4. our client (your employer/engager) who may access and use the reports created through their corporate account;
- 6.1.5. any competent law enforcement body, regulator, government agency, court or other third party where necessary to (i) comply with the law; (ii) exercise, establish or defend our legal rights, or (iii) protect the rights, property, or safety of dunhumby or others;
- 6.1.6. third parties in the context of the possible sale or restructuring of our business and
- 6.1.7. to any other person with your consent to the disclosure.
- 6.2. To the extent that US state privacy laws apply to the processing of your information, we confirm that we do not sell your personal information
- 6.3. If you need the full list of third-party service providers we use, please contact us using the contact details provided under the “How to contact us” heading below.

## 7. How we protect your personal data

- 7.1. We use appropriate security measures to protect the personal data that we collect and process about you to help ensure it remains secure against accidental or unlawful destruction, loss, alteration or unauthorised access.
- 7.2. We protect the personal data with a combination of technical and organisational measures which are designed to provide a level of protection and security appropriate to the risk of processing the personal data. Specific measures we use include restricting access to staff on a need-to-know basis and where appropriate only sending aggregate data to third parties. We also encrypt your username and email address in transit and at rest.
- 7.3. Whilst we take appropriate technical and organisational measures to safeguard your personal data, it is important that you keep your Products & Platforms login details protected from unauthorised access.

## 8. International data transfers

- 8.1. Depending on the Products & Platforms you are using, our servers are located in the UK as well as in the EU, and the US. However, our group companies and third-party service providers operate around the world.
- 8.2. As a result, your personal data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection and privacy laws that are different to the laws of your country and, in some cases, may not be as protective.
- 8.3. However, we have taken appropriate safeguards to ensure that your personal data will remain protected. These include implementing the European Commission's Standard Contractual Clauses for transfers of data between our group companies, which require all group companies to protect personal data they process from the EEA in accordance with EU data protection and privacy law.
- 8.4. Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our third-party service providers and further details can be provided upon request.
- 8.5. For transfers from the UK, we implement either the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, as issued by the UK Information Commission, to ensure a similar level of protection under the UK GDPR.
- 8.6. If you have any questions or need more information regarding international transfers of your personal data, please contact us using the contact details provided under the "How to contact us" heading below.

## 9. Data retention

- 9.1. With the exception of Google Analytics (see section 9.4 below), we normally retain the data we collect from you until our client (your employer/engager) ends their contract with us to provide the Products & Platforms, or for the specific retention period specified for the relevant Product & Platform, or, until the period specified in the contract that we have in place with the client (your employer/engager), or (if earlier) until we are informed you no longer need access to the Products & Platforms.
- 9.2. We may, however, need to keep your personal data for a legitimate business reason (for example, compliance with applicable legal, tax or accounting requirements). We will only retain such data for as long as is necessary for the legitimate business reason and always in accordance with our client's (your employer/engager's) contract with us.
- 9.3. Where possible, we will also instruct third parties to delete personal data.
- 9.4. If the Services we provide to your employer/engager include the use of Google Analytics, your personal data processed through Google Analytics will be retained for a period of 14 months. For further details on how analytics third-party service providers use your information, please see section 6.1.2.

9.5. Where the Key Performance Report product is used: Our third-party payments provider, Stripe Inc., may retain your payment information to comply with their financial regulatory and other legal obligations in accordance with their Privacy Policy which you can view [here](#).

## 10. Your Rights

10.1. If or UK data protection laws apply to our processing of your personal data, you have the right to access the personal data we hold about you and know how we use it and who we've shared it with. You can also ask that we correct personal data that you believe is inaccurate in this same way.

10.2. In addition to being able to access or correct your personal data, you may also have other data protection rights:

10.2.1. If we have processed your personal data with your consent, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your personal data carried out in reliance on other lawful grounds; and

10.2.2. In certain circumstances, you may have the right to:

10.2.2.1. object to our processing of your personal data;

10.2.2.2. ask us to restrict processing of your personal data (although sometimes we may not be able to comply with this request);

10.2.2.3. have your personal data erased; and

10.2.2.4. obtain your personal in a structured, commonly used, and machine readable format, and reuse it elsewhere or ask us to transfer it to a third party.

10.3. You also have the right to complain to us if you have any concerns about our processing of your personal data. Additionally, you can report any issues or concerns to the national supervisory authority in the country of your residence or the place of the alleged infringement. For more information, please contact your local authority

10.3.1. the Information Commission is the national supervisory authority for the UK and their contact information is available [here](#); and

10.3.2. the contact information for national supervisory authorities in the European Economic Area are available [here](#).

10.4. Other countries' laws may grant you similar rights.

10.5. If US data protection laws apply to our processing of your information, you may have certain rights such as the right to access the personal data we hold about you, know how we've used it and who we've shared it with. You may have certain additional rights such as, in certain circumstances, the right to object to our processing of your personal data or to have your personal data erased, such as where it has been unlawfully processed or where there is no overriding legitimate ground for the processing.

- 10.6. If US data protection law applies to the processing of your information:
- 10.6.1. we confirm that we do not sell your personal information;
  - 10.6.2. we do not use sensitive personal information for purposes requiring a right to limit;
  - 10.6.3. you may designate an authorised agent to submit certain requests on their behalf; and
- 10.7. you have the right to appeal a decision if we decline to act on your request.
- 10.8. If you wish to exercise these rights, please make any such requests in writing to [individualrights@dunnhumby.com](mailto:individualrights@dunnhumby.com). We may ask you for information to verify your identity (e.g. a copy of your passport, national ID or other such documentation which will allow us to determine your identity and therefore your legal rights in relation to your personal data) or clarify your request.
- 10.9. We respond to all requests we receive from individuals wishing to exercise their rights in accordance with applicable laws.

## 11. Cookies

- 11.1. Please read our [Cookie Notice](#) for information about how we use cookies in the Products & Platforms.

## 12. Changes to this Privacy Notice

- 12.1. We can update this Privacy Notice at any time and will do so if we change the Products & Platforms in a way that changes the personal data we collect about you or how we use it; or, if the law changes so that we need to change our Privacy Notice.
- 12.2. The current version of the Privacy Notice will always be the version which you can access through the link on the relevant Products & Platforms and replaces all previous versions. For information on when this Privacy Notice has been updated, please see the table in the “Additional Information” section below.

## 13. How to Contact Us

- 13.1. If you have any queries about this Privacy Notice or the way we handle or process your personal data, please contact our Data Protection Officer via:
- 13.1.1. email: [individualrights@dunnhumby.com](mailto:individualrights@dunnhumby.com); or
  - 13.1.2. post: FAO Data Protection Officer, dunnhumby Limited, 184 Shepherds Bush Road, London, England, W6 7NL

## 14. Data Controller

- 14.1. dunnhumby Limited provides the Products & Platforms and is the data controller of your personal data processed for the purposes described in this Privacy Notice.

## 15. Additional Information

15.1. To find out more information about:

15.1.1. dunnhumby, please see the “About Us” section of our website (available here); and

15.1.2. cookies in general, including how to see what cookies have been set and how to manage and disable them, our Cookie Notice.

Version	Date	Details of Change
1.0	February 2026	Privacy Notice created, consolidating previous separate notices for each of the Products & Platforms
2.0	May 2026	Reviewed and approved by Privacy Legal Director

## 16. Annex 1: Relevant Products & Platforms

16.1. This Privacy Notice applies to the following dunnhumby Products & Platforms:

- dh Assortment
- dh Citrus Ads
- dh Portal
- dh Price
- dh Sphere
- dh Key Performance Report
- dh OneFour
- dh Shop
- dh Promotions