



## **Introduction and contents**

This is the privacy policy for TJX Research and Publishing, LLC, (“TJX”).

Our [values](#) guide everything that we do including our editorial approach and how we use personal data.

We are strongly committed to keeping your personal data safe. To complement our committed approach to privacy protection, we think carefully about our use of personal data, and below you can find the details of what we do to protect your privacy. This policy covers, among other topics:

Information about your rights, the choices available to you, and our obligation to prevent abuse or infringement.

Transparency about how we collect and use your personal data, including when and how it is shared.

Information on how we protect your personal data.

Information on how we will facilitate your rights and respond to your questions.

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### **About this privacy policy:**

This privacy policy explains how we collect, use, share, transfer and sell your personal data when you use the services provided on our site and our apps or interact with us. This privacy policy also explains your data privacy rights. This includes subscriptions, vouchers, and contributions.

Personal data is any information about you by which you can be identified or be identifiable. This can include information such as:

Your name, date of birth, gender, email address, postal address, phone number, mobile number or financial details, such as payment cards you use to purchase products or subscriptions or support our journalism.

Information about your device (such as the IP address, which is a numerical code to identify your device that can provide information about the country, region, or city where you are based).

Information relating to how you use and interact with our sites, apps, and services.

When we refer to “personal data” in this policy, we are also referencing “personal information, which you can read more about [here](#).

Sometimes our site and apps may contain links to sites and services that are not part of TJX family of offerings. These sites and services have their own privacy policies. If you follow a link to these non-TJX sites and apps, you should read the privacy policy shown on their site.

### **Who we are and how to contact us:**

TJX Research and Publishing, LLC., \_\_\_\_\_, Brooklyn, N.Y. 11 \_\_\_\_\_ is the data controller in respect of your personal data that you share with us. This means that we are responsible for deciding how and why we hold and use your personal data. If you want to contact us directly, you can find our contact details in the “Contact us for information about how we use your personal data” section below.

### **The types of personal data we collect about you:**

We collect your personal data when you visit our site and apps, subscribe for products or services, contribute to TJX or when you interact with us. We will only collect your personal data in line with applicable laws. We collect your personal data in various ways:

1. Directly from you, e.g., when you sign up for our services, purchase products or services and when you browse our site or use our apps.

2. Personal data we generate about you, e.g., personal data we use to authenticate you, or personal data in the form of your IP address or your preferences.

3. Personal data we collect from third parties, e.g., personal data that helps us to combat fraud or which we collect, with your permission, when you interact with your social media accounts.

More details about these three categories of personal data are provided below.

**The personal data we collect when you register for a TJX account:**

When you register for a TJX account on TJX.com, we collect: your username, your name, your email address your contact number, other details such as your residential or billing address when you sign up for membership or a subscription. Some limited data from your social media profile (further information on this is below), if you have signed in to TJX.com using your social media details, your photograph, if you add one to your profile page.

You can change or remove these details using the profile and settings area of your TJX account.

**Personal data we generate about you:**

When you register for an account or sign up for a newsletter, we assign you a unique ID number. This allows us to manage your preferences, for example, the newsletters to which you have subscribed.

When you register for an account, we use your unique ID to recognize you when you are signed into our services. This will recognize you if you sign in using the same account on a new device or through a different application such as the TJX app on mobile devices.

When you use our site or apps, we may also use cookies or similar technology to collect extra data, including:

Your IP address - a numerical code to identify your device, together with the country, region, or city where you are based.

Your geolocation data - your IP address can be used to find information about the latitude, longitude, altitude of your device, its direction of travel, your GPS data, and data about connection with local Wi-Fi equipment.

**Information on how you interact with our services:**

Your browsing history of the content you have visited on our sites, including how you were referred to our sites via other websites.

Details of your computer, mobile, TV, tablet, or other devices, for example, the unique device ID, unique vendor or advertising ID and browsers used to access our content.

We will not collect special categories of data from you - such as personal data concerning your race, political opinions, religion, health, or sexual orientation - unless you have chosen to provide that type of personal data to us.

**When you use our apps:**

TJX apps use personal data based on the content you have viewed. Information on bugs and crashes is also sent to us when you use our apps. A list of the articles that you have recently viewed is also cached in the local storage on your device. You can delete this reading history in the settings of the app. You can choose to receive notifications on your device via the app, and manage these notifications in the settings of the app.

**Using your social media details to sign into your TJX account:**

When you sign into our site or apps using your Facebook login details, you give permission to Facebook to share with us your email address and certain aspects of your Facebook profile if you have made these public on your Facebook profile. This only includes your first and last name, age range, link to your Facebook profile and profile picture. We do not have access to updates on your Facebook profile. If you use your Google login details, you give Google permission to share the personal data that you have made public in your Google profile. This only includes your first and last name, your email address and whether your email address has been validated, your age range, a link to your Google profile and, if you have one, your profile picture. If you register or sign in with your Apple ID, you give Apple permission to share your personal data with us. You can also choose to hide your email and Apple will create a random email address so your personal email can stay private. This email address will be linked to your Guardian profile and will be used to retrieve your subscribed content.

We will then use this personal data to form a profile for your TJX account. If you remove the TJX app

from your Facebook settings, or from your Google settings, or your Apple ID, we will no longer have access to this data. However, we will still have the personal data that we received when you first set up your TJX account using your Facebook, Google login, or Apple ID.

**Personal data when you post comments about the TJX on other social media sites:**

If you have mentioned TJX in posts on social media sites, then we may collect your social media handles. For example, when you mention TJX in a tweet, we may collect your Twitter handle.

**When you post publicly (comments) on our sites:**

When you post on a discussion board or comment publicly on an article on one of our sites, the personal data you post, including your username and other information about yourself, are publicly accessible. This personal data can be viewed online and collected by other people. We are not responsible for the way these other people use this personal data. When contributing to a discussion, we strongly recommend you avoid sharing any personal details, including information that can be used to identify you directly such as your name, age, address, and name of employer. We are not responsible for the privacy of any identifiable information that you choose to post in our online community or other public pages of the site.

**How we collect personal data:**

We collect personal data when you:

Become a supporter or register for an account on the TJX.com make contributions to fund and support TJX.

Pay for a subscription or purchase any other products/services for yourself or others.

Sign up for our editorial emails.

Post in our online community.

Sign up for marketing communications use mobile devices to access our content.

Access and interact with any of our site and apps.

Through cookies and other similar technologies.

When you contact us via email, social media, our apps, or similar technologies or when you mention us on social media test our products, participate in focus groups, or provide us with feedback.

### **How we use your personal data:**

We use personal data collected through our sites and apps only when we have a valid reason and the legal grounds to do so. We determine the legal grounds based on the purposes for which we have collected your personal data.

### **Legal grounds for using your personal data:**

The legal ground may be one of the following:

*Consent:* Often we will use your personal data because we have asked for your consent, which you can withdraw at any time. Examples of where we ask for your consent include:

To send marketing emails to you when we have asked your permission. You can withdraw your consent to receiving these emails at any time by clicking on the “unsubscribe” link at the bottom of the email or through your email preferences in the “emails and marketing” tab, when signed into your TJX account.

To place non-essential cookies, or other similar technology. We provide more details of how we use cookies in our [cookie policy](#). In particular we use cookies to enable the display of advertising through Google Ad Manager and to collect analytics on how our site is used, including through Google Analytics. You can withdraw your consent to us placing these cookies at any time through our Privacy settings link on our sites in the footer of every page.

*Performance of a contract with you (or in order to take steps prior to entering into a contract with you):*

We will use your personal data if we need to in order to perform a contract with you. For example, where you have purchased a subscription from us, we will need to use your contact details and payment data in order to process your order and deliver your subscription or we may contact you directly via social media or email if you enter competitions, prize draws, bids or respond to call-outs.

*Compliance with law:* In some cases, we may have a legal obligation to use or keep your personal data.

*Our legitimate interests:* We may process your personal data where it is necessary for our legitimate interests in a way that might be expected as part of running TJX in a way which does not materially impact your rights and freedoms. For example, it is in our legitimate interests for us to understand our readers, promote our services and operate our sites and apps efficiently for the creation, publication and

distribution of news, media, and related journalistic content both online and in print form, globally.

Examples of when we rely on our legitimate interests to use your personal data include:

When we analyze what content has been viewed on our site and apps, so that we can understand how they are used and improve our content.

To monitor the number of articles that users of our apps read, so that we can request our app users subscribe to our apps.

When we respond to your queries and to resolve complaints.

For security and fraud prevention, and to ensure that our sites and apps are safe and secure and used in line with our terms of use.

To test changes to our site we may vary the personal data that is collected and how it is used. This allows us to see the impact on users and how users interact with different options on our site and apps.

Where we rely on cookies to collect any personal data please see our [cookie policy](#) for more information and how to manage your cookie choices through our Privacy settings link on our sites in the footer of every page.

*Access permissions when you are using the TJX app:*

When you use the TJX app, we will ask for permission to access particular functions of your mobile device. When we ask for permissions will depend on the operating system of your mobile device, but can include:

When you decide to store content including photographs on your mobile device to read or use when offline. We will need your permission to save content to your mobile device.

Asking permission to access your contact details/profile on your mobile device, so that we can add or find your TJX account on your phone.

If you decide to submit content, such as photographs, to TJX, we will ask permission to access your camera or photographs.

*Updating your personal data and your profile page on our sites:*

When you register for an account with TJX.com, you have access to a profile page. Under “edit profile” you can review and update what personal data is public when you comment on our articles, or if people



look up your profile.

You may also update your marketing preferences in the “emails and marketing” tab in your account.

Personal data that we receive about you from other organizations.

*Adding to or combining the personal data you provide to us:*

When you sign up to our services, we may add to the personal data you give us by combining it with other personal data shared with us by other trusted organizations. This includes, for example, the region that you are located in, so that we can show you the prices for subscriptions or other products. We may also add personal data to improve the accuracy of your delivery address when we send out mail. We may also obtain your personal data from partners whose offers we include in some of our marketing communications, and we use this personal data to ensure that we do not send you irrelevant marketing and to ensure the accuracy of the information we hold.

We also use personal data based on the content you have viewed on our site and apps and your interaction with the content to add you to groups with similar interests and preferences, so that we can make our online advertising more relevant. Sometimes we use data about your interests or demographics that some third parties have collected from you online to add you to these groups. Please refer to our [cookie policy](#) for more information on how we use cookies.

*Children's personal data:*

We do not aim any of our products or services directly at children under the age of thirteen and we do not knowingly collect personal data about children under thirteen in providing our services. Some of our services may have a higher age restriction and this will be shown at the point of registration.

We also note and comply with the New York law which prohibits sale of personal data of consumers between 13-16 years of age unless their guardian has authorized the sale.

*Security of your personal data:*

We have implemented appropriate technical and organizational controls to protect your personal data against unauthorized processing and against accidental loss, damage, or destruction. You are responsible for choosing a secure password when we ask you to set up a password to access parts of our site or apps. You should keep this password confidential and you should choose a password that you do not use on

any other site. You should not share your password with anyone else, including anyone who works for us. Unfortunately, sending any information, including personal data, via the internet is not completely secure. We cannot guarantee the security of any personal data sent to our site while still in transit and so you provide it at your own risk.

**We share your personal data with other organizations that are not directly linked to us under the following circumstances:**

*Service providers* - We may share your data with other organizations that provide services on our behalf. We may do this to perform a contract we have entered into with you, where it is in our legitimate interests or with your consent. Examples of when we may share your data with service providers include sharing with:

*Online payments processors* - who process credit and debit card transactions on our behalf fraud management providers that help us to identify and prevent online fraud.

*Internet and cloud hosting services providers* - such as Amazon Web Services (AWS) software service providers that assist us with our customer relationship management communications services providers, error tracking software providers, such as Sentry and Google Firebase, to help us diagnose and fix errors and optimize the performance of our website and apps.

*Service providers* - that help us carry out analytics, and provides us with data management platform services. Service providers that help provide us with insights and analytics that help us to improve our products and services. For example, we use Google Analytics to understand how visitors engage with our site or apps.

*Google ReCaptcha* - which we use to protect our site and apps from fraudulent users.

*Data management companies* - that help us collect data via online forms and surveys.

*Service providers* - that help provide online identity-as-a-service and access management services.

*Service providers* - that allow us to deliver personalized advertising to your devices.

*Service providers* - that allow us to compare your personal data with information held by advertising partners and identify if you are known to both us and our advertising partner.

*Advertising partners* - We may also share your data collected through our website and apps with our

advertising partners, as set out in our [cookie policy](#). These partners help us deliver relevant advertising across our website and apps. For example, we use Google Ad Manager to assist us with the delivery of relevant ads.

*Agencies and authorities if required by law* - We may reveal your personal data to any law enforcement agency, court, regulator, government authority, or in connection with any legal action if we are required to do so to meet a legal or regulatory obligation, where the request is proportionate, or otherwise to protect our rights or the rights of anyone else (for example, in response to a valid and properly served legal process such as subpoena or warrant). If we have your contact details, we will take reasonable steps to attempt to notify you prior to disclosing your data unless (i) prohibited by applicable law from doing so, or (ii) there are clear indications of unlawful conduct in connection with your use of TJX services.

*Event sponsors and partners* - We may share your personal data with sponsors of TJX events and partners who we hold events with for marketing purposes when you have given your permission for us to do so. We may also share your personal data with these sponsors and partners for event administration purposes.

*Prize draws, competitions, and bids* - We may share your personal data with sponsors and partners for the purposes of selecting and notifying winners when you participate in any of our prize draws, competitions, and bids. We may also share your data with entities offering any prize you have won in order for that entity to contact you about such a prize.

*Social media organizations* - We may share your personal data with other organizations when our web pages use social plug-ins from these organizations (such as the “Facebook Recommend” function, Twitter’s retweet function, Google+ function). These other organizations may receive and use personal data about your visit to our sites or apps. If you browse our site or view content on our apps, personal data they collect may be connected to your account on their site. For more information on how these organizations use personal data, please read their privacy policies.

**How long we keep your personal data:**

We keep your personal data for only as long as we need to. How long we need your personal data depends on what we are using it for, as set out in this privacy policy. For example, we may need to use it to

answer your queries about a product or service and as a result may keep personal data while you are still using our product or services. We may also need to keep your personal data for accounting purposes, for example, where you have bought a subscription. If we no longer need your data, we will delete it or make it anonymous by removing all details that identify you. If we have asked for your permission to process your personal data and we have no other lawful grounds to continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing in future.

### **How we may contact you:**

#### *Service communications*

From time to time, we may send you service emails, for example, telling you your subscription is coming to an end or thanking you when you contribute or place an order with us.

#### *Marketing communications and editorial newsletters*

If we have your permission or you have not opted out, we may send you materials we think may interest you, such as new TJX offers and updates. Depending on your marketing preferences, this may be by email, phone, SMS, or post.

We offer a range of editorial newsletters. You can manage your subscription to these emails through your profile page when you are signed into your TJX account.

You can decide not to receive these emails at any time and will be able to “unsubscribe” directly by clicking a link in the email or through your email preferences in the tab “emails and marketing” when you are signed into your TJX account.

For more information on how to manage your account please see <https://> .

#### *Market research*

Sometimes we may contact you for market research purposes, for example about a survey. You can opt out from being contacted in this way by signing into your TJX account and going to the tab “emails and marketing”.

#### *Responding to your queries or complaints*

If you have raised a query or a complaint with us, we may contact you to answer your query or to resolve your complaint.

### *Special Note to California Users*

If you elect to use the “California resident - Do not sell” button, we will not recontact you about that choice for at least 12 months.

### *Cookies and similar technologies*

When you visit our sites or when you use our apps, we may collect personal data from you automatically using cookies or similar technologies.

This privacy policy includes our [cookie policy](#), where you can find more information about our use of cookies.

Your privacy and data protection rights with regard to the personal data that we hold about you.

You have a number of rights with regard to the personal data that we hold about you and you can contact us with regard to the following rights in relation to your personal data:

You have the right to receive a copy of the personal data we hold about you. You have the right to correct the personal data we hold about you.

Where applicable, you may also have a right to receive a machine-readable copy of your personal data.

You also have the right to ask us to delete your personal data or restrict how it is used. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request.

Where applicable, you have the right to object to processing of your personal data for certain purposes.

Where you have provided us with consent to use your personal data, you can withdraw this at any time.

If you would like to exercise any of your rights specified above, please email [dataprotection@TJX.com](mailto:dataprotection@TJX.com)

or write to the Data Protection Officer at TJX Research and Publishing, LLC., Brooklyn, N.Y. 11 . We will respond to requests within one month.

We may need verification of your identity to proceed with a request. If you provide us with proof of identity containing information that does not match our records, we may request further proof of identity

from you. If your request is complicated or if you have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of your personal data (or to exercise any of the other rights). However, for any further copies requested by you, we may charge a reasonable fee based on administrative costs.

#### Your United States privacy rights

Under the California Consumer Privacy Act, California Civil Code Section 1798.100, if you are a resident of California, you may contact us with regard to the following rights in relation to your personal data:

**Right of Access:** You have a right to request access to the personal data we may hold on you for the past twelve (12) months. You may submit up to two (2) requests per year for access to your personal data.

**Right to Opt-In/Opt-Out of Sale of Personal Data:** For individuals sixteen (16) years or older, you have the right to opt-out of sale of personal data we may hold on you. You can exercise this right at any time by pressing the “California resident - Do not sell” link in the footer of every page on our site. For individuals between thirteen (13) to sixteen (16) years old, you have the right to opt-in to the sale of personal data we may hold on you.

**Right to Deletion:** You also have the right to ask us to delete personal data we may hold on you or restrict how it is used. There may be exceptions to the right to deletion which, if applicable, we will set out for you in response to your request.

**Right to Non-Discrimination:** We will not discriminate against you for exercising any of your California Consumer Privacy Act rights.

If you want to make any of these requests, please contact [dataprotection@theguardian.com](mailto:dataprotection@theguardian.com). We will deal with requests for access to your personal data within forty-five (45) days for California-specific requests.

To help us respond as you expect, please specify that you are making a request under the California Consumer Privacy Act. We may need to request specific information from you to help us confirm your identity. If you provide us with proof of identity containing information that does not match our records, we may request further proof of identity from you.

