

Privacy Policy - last updated 17.08.2026

INTRODUCTION

Welcome to the OnCommerce Privacy Policy ("Privacy Policy").

OnCommerce respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how OnCommerce looks after your personal data when you visit the OnCommerce Marketplaces (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

Please use the Glossary (section 14) to understand the meaning of some of the terms used in this Privacy Policy.

1 PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy sets out how OnCommerce collects and processes the personal data of those accessing the applicable OnCommerce Marketplace(s), including any data that is provided through the applicable OnCommerce Marketplace(s) relating to purchases that are made through the guest and account set up options.

Please note that the OnCommerce Marketplaces are not intended for persons under the age of 18 years old. OnCommerce does not knowingly collect data relating to minors.

2 CONTROLLERS

The OnCommerce Companies operate a number of online marketplaces, including OnBuy, easyShop.com, and Comet (the "OnCommerce Marketplaces").

OnBuy Ltd and OnBuy (EU) Limited are each an "OnCommerce Company" and together the "OnCommerce Companies". References in this Privacy Policy to "OnCommerce", "we", "us" and "our" mean the applicable OnCommerce Company which is responsible for processing your personal data.

For users located in the United Kingdom, OnBuy Ltd is the controller of personal data processed in connection with the OnCommerce Marketplaces.

For users based outside of the United Kingdom, OnBuy (EU) Limited is the controller of personal data processed in connection with the OnCommerce Marketplaces.

If you purchase a product through an OnCommerce Marketplace, the applicable OnCommerce Company and the relevant third-party independent seller will each act as separate controllers of your personal data. The applicable OnCommerce Company is responsible for processing your personal data in connection with the operation of the OnCommerce Marketplace, your account, payments,

OnCommerce Privacy Policy

customer support, payment processing and marketplace administration. The seller is separately responsible for processing your personal data where required to fulfil your order, provide customer service in relation to the product, and comply with its own legal obligations.

OnCommerce has appointed a data protection officer (DPO), who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights in relation to this policy, please contact OnCommerce using the details set out below.

3 CONTACT DETAILS

If you have any questions about this Privacy Policy or our privacy practices, you can contact us through the support page for the OnCommerce Marketplace you use.

Alternatively, you may contact the OnCommerce Data Protection Officer as follows:

For matters relating to OnBuy Ltd (where you are a UK-based user):

OnBuy Ltd
167-169 Great Portland Street,
Fifth Floor,
London,
England
W1W 5PF
Email: legal-gb@oncommerce.com

For matters relating to OnBuy (EU) Limited (where you are a non-UK-based user):

OnBuy (EU) Ltd
25 North Wall Quay,
Dublin 1,
Dublin,
D01 H104,
Ireland
Email: legal-gb@oncommerce.com

UK-based users have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues: [Contact us | ICO](#).

EU-based users may raise complaints with their National Data Protection Authority: [Our Members | European Data Protection Board \(europa.eu\)](#).

You may also, or in the alternative, commence legal proceedings against the applicable OnCommerce Company.

OnCommerce Privacy Policy

OnCommerce would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

4 CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM ONCOMMERCE OF CHANGES

OnCommerce keeps this Privacy Policy under regular review. We may amend this Privacy Policy from time to time to make sure it is up to date and accurate. Historic versions can be obtained by contacting us. Your continued use of the OnCommerce Marketplaces following the effective date of any updated Privacy Policy will constitute acknowledgement of the updated Privacy Policy.

It is important that the personal data held about you is accurate and current. Please keep OnCommerce informed if your personal data changes.

If we materially change the ways in which we use or disclose personal information previously collected from you through the Services, we will notify you through the Services, by email or other communication.

5 THIRD-PARTY LINKS

Each of the OnCommerce Marketplaces may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. OnCommerce does not control these third-party websites and is not responsible for their privacy statements. When you leave the applicable OnCommerce Marketplace, you are encouraged to read the privacy policy of every website you visit.

6 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

OnCommerce may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title and date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from the applicable OnCommerce Marketplace(s).
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the applicable OnCommerce Marketplace(s).
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, and content of and information about the messages you send and receive to other users through the applicable OnCommerce Marketplace(s).
- **Usage Data** includes information about how you use the applicable OnCommerce Marketplace(s), products and services, such as the pages or other content you view, referrer information (the website you visited before coming to the applicable OnCommerce Marketplace(s)), and the dates and times of your visits.
- **Marketing and Communications Data** includes your preferences in receiving marketing from OnCommerce and our third parties, and your communication preferences.

OnCommerce also collects, uses and shares Aggregated Data such as statistical or demographic data for any lawful purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, OnCommerce may aggregate your Usage Data to calculate the percentage of users accessing specific marketplace features. However, if Aggregated Data is connected or combined with your personal data so that it can directly or indirectly identify you, the combined data will be treated as personal data and used in accordance with this Privacy Policy.

OnCommerce does not intentionally collect or require you to provide any Special Categories of Personal Data about you (including information about your race or ethnicity, religious or philosophical beliefs, health, sex life or sexual orientation, political opinions, trade union membership, or genetic data), nor any information about criminal convictions and offences. If you choose to provide this type of information in correspondence, support requests, reviews, marketplace messages or other communications, OnCommerce will only process it where necessary for the purpose for which it was provided and in accordance with this Privacy Policy and applicable data protection laws.

Where OnCommerce may need to collect personal data by law, or under the terms of a contract OnCommerce and/or a seller may have with you, and you fail to provide that data when requested, OnCommerce or the seller may not be able to perform the contract, and the sale may not proceed. In this case, OnCommerce may have to cancel the transaction. In such an instance, you will be notified.

OnCommerce Privacy Policy

7 HOW IS YOUR PERSONAL DATA COLLECTED?

Different methods are used to collect data from and about you, including through:

- **Direct interactions.** You may give OnCommerce your Identity, Contact and Financial Data by filling in forms or by corresponding with OnCommerce by post, phone, email or otherwise. This includes personal data you provide when you:
 - Indicate your interest in products sold on the applicable OnCommerce Marketplace(s) or OnCommerce services;
 - create an account on the applicable OnCommerce Marketplace(s);
 - subscribe to OnCommerce publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give feedback or make other contact with OnCommerce.
- **Automated technologies or interactions.** As you interact with OnCommerce, OnCommerce will automatically collect Technical Data about your equipment, browsing actions and patterns. This data is collected using cookies, and other similar technologies. OnCommerce may also receive Technical Data about you if you visit other websites employing our cookies. Please see the relevant Cookie Policy for the OnCommerce Marketplace you use for further details.
- **Third parties or publicly available sources.** OnCommerce may receive personal data about you from various third parties and public sources as set out below, Technical Data from the following parties' analytics providers, and search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House.

8 HOW YOUR PERSONAL DATA IS USED

OnCommerce will only use your personal data when the law allows it. Most commonly, your personal data will be used in the following circumstances:

- Where you have consented.
- Where OnCommerce needs to perform the contract that is about to be, or has been, entered into.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where OnCommerce needs to comply with a legal obligation.

Generally, OnCommerce does not rely on consent as a legal basis for processing your personal data, although we will obtain your consent before sending you direct marketing communications where

required by law. Where permitted under applicable law, we may rely on the soft opt-in rules to send marketing about similar products or services, unless you opt out. You have the right to opt out at any time by clicking "unsubscribe" (see Marketing – opting out – below) on any marketing email or by contacting us through the support page for the OnCommerce Marketplace you use.

Purposes for which OnCommerce will use your personal data

Set out below is a description of all the ways your personal data may be processed by OnCommerce and which of the legal bases are relied upon to do so. OnCommerce has also identified what its legitimate interests are, where appropriate.

Please note that your personal data may be processed on more than one lawful ground depending on the specific purpose for which your data is used. Please contact us through the support page for the OnCommerce Marketplace you use if you need details about the specific legal basis being relied upon to process your personal data where more than one ground has been set out in the table below.

Purpose/activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register and administer your seller account on the applicable OnCommerce Marketplace(s)	a. Identity b. Contact c. Photographic ID	a. Performance of a contract b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests in verifying seller identity, preventing fraud and protecting the integrity of the OnCommerce Marketplaces
To register and administer your customer account on the applicable OnCommerce Marketplace(s), including OnBuy Cashback and easyPoints (each as applicable and where available)	a. Name b. Postal address c. Email address d. Telephone number e. Bank details (if you have a Cashback account)	Performance of a contract
To register you as a new customer	a. Identity b. Contact	Performance of a contract with you

OnCommerce Privacy Policy

Purpose/activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To process and deliver your order, including: a. Manage payments, fees and charges b. Collect and recover money owed to OnCommerce	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, which will include: a. Notifying you about changes to our terms or Privacy Policy b. Asking you to leave a review or take a survey	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to study how customers use the OnCommerce Marketplaces, and to grow OnCommerce and the OnCommerce Marketplaces)

OnCommerce Privacy Policy

Purpose/activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To administer and protect our business and the applicable OnCommerce Marketplace(s) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests (for running our business operations, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b. Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising OnCommerce and the applicable OnCommerce Marketplace(s) serves to you	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business strategy and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

OnCommerce Privacy Policy

Purpose/activity	Type of data	Lawful basis for processing, including basis of legitimate interest
	f. Marketing and Communications	

Marketing

OnCommerce strives to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can view and set your marketing preferences when you first make a purchase through your applicable OnCommerce Marketplace account. At any time, you can view and set your marketing preferences through your Account Settings.

Promotional offers from OnCommerce

OnCommerce may use your Identity, Contact, Technical, Usage and Profile Data to provide you with personalised offers of products and services that may be of the most interest to you.

Third-party marketing

OnCommerce will get your express consent before your personal data is shared with any third party for marketing purposes.

Opting out

You can request a block on marketing messages at any time by logging into your account and checking or unchecking relevant boxes to adjust your marketing preferences by following the opt-out links on any marketing message sent to you, and by contacting OnCommerce at any time. You are also able to close your applicable OnCommerce Marketplace account at any time which will place a block on marketing, save for that marketing which has already been processed.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies OnCommerce uses, please see the relevant Cookie Policy for the OnCommerce Marketplace you use for further details.

Change of purpose

OnCommerce will only use your personal data for the purposes for which it collected it, unless it is reasonably considered that there is a need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new

purpose is compatible with the original purpose, you can contact us through the support page for the OnCommerce Marketplace you use.

If OnCommerce needs to use your personal data for an unrelated purpose, you will be notified, and the legal basis will be explained to you.

Please note that OnCommerce may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9 DISCLOSURES OF YOUR PERSONAL DATA

OnCommerce may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which OnCommerce will use your personal data* above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom an OnCommerce Company may sell, transfer or merge parts of its business or assets. Alternatively, OnCommerce may seek to acquire other businesses or merge with them. If OnCommerce becomes restructured or under a different ownership model, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

OnCommerce requires all third parties to respect the security of your personal data and to treat it in accordance with the law. OnCommerce does not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with the specific instructions of OnCommerce.

10 INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the United Kingdom and/or the European Economic Area, so their processing of your personal data will involve a transfer of data outside the United Kingdom and/or European Economic Area.

Whenever the applicable OnCommerce Company transfers your personal data internationally, it will ensure that an appropriate level of protection is afforded to it, including by relying on adequacy regulations or decisions, or by using appropriate contractual safeguards such as standard contractual clauses, the UK International Data Transfer Agreement or the UK Addendum, as applicable.

Please contact us if you want further information on the specific mechanism used by OnCommerce when transferring your personal data out of the United Kingdom and/or European Economic Area.

11 DATA SECURITY

OnCommerce has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data is limited to those employees, agents, contractors and other third parties who have a business need to know. Your personal data shall only be processed pursuant to our instructions, and all persons are subject to a duty of confidentiality. However, because no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.

OnCommerce has procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where OnCommerce is legally required to do so.

12 DATA RETENTION

How long will you use my personal data for?

OnCommerce will only retain your personal data for as long as reasonably necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. OnCommerce may retain your personal data for a longer period where necessary to establish, exercise or defend legal claims, resolve disputes, investigate fraud or misuse of the OnCommerce Marketplaces, or comply with its legal obligations.

The length of time for which OnCommerce retains personal data depends on the nature of the information, the purpose for which it was collected, and any applicable legal, regulatory or operational requirements. Typical retention periods include:

Category of data	Typical retention period
Customer account information	For the duration of the account and up to 6 years after account closure where required for legal, tax, accounting or dispute resolution purposes
Seller account information	For the duration of the seller relationship and up to 6 years after account closure where required for legal, regulatory, fraud prevention or dispute resolution purposes
Transaction and order records	Up to 6 years following the relevant transaction in order to comply with legal, tax and accounting requirements

OnCommerce Privacy Policy

Category of data	Typical retention period
Customer support enquiries and correspondence	Typically, up to 6 years from resolution of the enquiry, depending on the nature of the issue and any associated legal or regulatory requirements
Marketing preferences and suppression records	Retained for as long as reasonably necessary to ensure marketing preferences are respected and to demonstrate compliance with applicable laws
Fraud prevention, security and risk management records	Retained for as long as reasonably necessary to detect, prevent and investigate fraud, misuse of the OnCommerce Marketplaces and other security incidents, and to comply with legal obligations

In some circumstances, you can request that some, or all of, your personal data is deleted. See [Your legal rights](#) below for further information.

In some circumstances, your personal data will be anonymised (so that it can no longer be associated with you) for research or statistical purposes, in which case, this information can be held indefinitely without further notice to you.

13 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Rights relating to automated decision-making and profiling, where this applies to you (see below).

OnCommerce Privacy Policy

If you wish to exercise any of the rights set out above, please make your request by contacting us through the support page for the OnCommerce Marketplace you use. For more details about your individual rights, please see the Glossary and/or [A guide to individual rights | ICO](#).

Automated decision-making

OnCommerce uses automated tools provided by third-party service providers to help identify and prevent fraudulent transactions and other misuse of the OnCommerce Marketplaces. In some circumstances, this processing may result in a transaction being automatically declined where the transaction is assessed as presenting an unacceptable level of fraud or security risk.

Where applicable, you have the right to obtain human intervention, express your point of view and contest a decision that is based solely on automated processing. If you wish to do so, please contact us through the support page for the OnCommerce Marketplace you use.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, a reasonable fee may be charged if your request is clearly unfounded, repetitive or excessive. Alternatively, your request may be refused in these circumstances.

What OnCommerce may need from you

OnCommerce may need to request specific information from you to help it confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. OnCommerce may also contact you to ask you for further information in relation to your request to speed up the processing of your response.

Time limit to respond

OnCommerce tries to respond to all legitimate requests within one month. Occasionally, it could take longer than a month if your request is particularly complex or you have made a number of requests. In this case, you will be notified and updated.

14 GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing OnCommerce and the OnCommerce Marketplaces to enable us to deliver the best service and most secure experience. We consider and balance any potential impact on you and your rights before processing your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to do so by law. You can obtain further information about how OnCommerce

assesses legitimate interests against any potential impact on you in respect of specific activities by contacting us through the support page for the OnCommerce Marketplace you use.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that OnCommerce is subject to, such as an applicable law, regulation, statute, court order or subpoena.

THIRD PARTIES

Internal Third Parties

Other companies within the Visor Commerce group, including companies which provide IT, system administration, reporting, operational, compliance, customer support or group management services to the OnCommerce Companies, acting as controllers, joint controllers or processors, as applicable.

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services acting as independent controllers or processors as applicable.
- HM Revenue & Customs, regulators and other authorities acting as independent controllers or processors as applicable where they require reporting or disclosure of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data OnCommerce holds about you and to check that OnCommerce is lawfully processing it.

Request correction of the personal data that OnCommerce holds about you. This enables you to have any incomplete or inaccurate data OnCommerce holds about you corrected, though OnCommerce may need to verify the accuracy of the new data you provide.

Request erasure of your personal data. This enables you to ask OnCommerce to delete or remove personal data where there is no good reason for OnCommerce continuing to process it. You also have the right to ask OnCommerce to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where OnCommerce may have

OnCommerce Privacy Policy

processed your information unlawfully or where OnCommerce is required to erase your personal data to comply with local law. Note, however, that OnCommerce may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where OnCommerce is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where OnCommerce is processing your personal data for direct marketing purposes. In some cases, OnCommerce may demonstrate that OnCommerce has compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask OnCommerce to suspend the processing of your personal data in the following scenarios:

- If you want OnCommerce to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need OnCommerce to hold the data even if OnCommerce no longer requires it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but OnCommerce needs to verify whether it has overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. OnCommerce will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for OnCommerce to use, or where OnCommerce used the information to perform a contract with you.

Withdraw consent at any time where OnCommerce is relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, OnCommerce may not be able to provide certain products or services to you. OnCommerce will advise you if this is the case at the time you withdraw your consent.

15 INTERPRETATION

If this Privacy Policy is translated into a language other than English, the English version will prevail in the event of any inconsistency or discrepancy between the English and the translated version, unless applicable law requires otherwise.