

Privacy Policy

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully as it will help you to understand our practices regarding your personal data and how we will treat it.

For the purposes of data protection law, the data controller of your personal data is Seckford Wines Ltd. You can contact us by the methods set out at the bottom of this privacy policy.

What personal data do we collect?

Personal data is any information that could be used to identify you in some way. The personal data that we collect from or about you may include the following:

- Your name;
- Your invoice address;
- Your delivery address;
- Your email address;
- Your contact telephone number;
- Your bank details;
- Your purchase history with us;
- Your usage of our website;
- Information you provide when you make an enquiry or complaint or provide us with feedback;
- Technical data about your device and browser such as IP address, browser type and version, time zone setting and location and operating system and platform; and
- Your communication preferences.

When do we collect personal data?

We may collect personal data in a variety of ways including:

- Personal data that you give us by ordering products, filling in forms on our site or by providing information from telephone / email / face to face discussions;
- Technical data collected from your device and/or browser when you browse our website or log in to your Portfolio and Account; and
- Information which we collect from analytics providers in relation to your use of our website.

Technical data is often collected using cookies. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. Ig you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy on our website footer.



Use of personal data and legal basis

We use your personal data for a variety of purposes related to the services that we provide. From a legal perspective, there are various lawful bases for doing so and we have set out an explanation of this below.

How and why we use your personal data	What is our lawful basis for processing your personal data
To register you as a new customer, manage your orders and perform other activity for the purposes of providing services to you	Entry into, and performance of, our contract with you.
To process payments made by you and recover any sums due to us	Necessary for our legitimate interest to
Communicating with you in connection with your purchases and enquiries, including recommending potential purchases.	Necessary for our legitimate interest to provide excellent customer service and develop our portfolio
To maintain and optimise our website	Necessary for our legitimate interest to develop an impactful website and effective user experience

We do not use your personal data for direct marketing purposes.

We do not use consent as our lawful basis for processing your personal data. If we do need your consent to process your data for a specific purpose we will seek that consent from you in accordance with data protection law. You do not have to give consent just because we ask for it and, if your give it to us, you may withdraw it at any time.

When do we share your personal data

We use some third parties to provide services to us, such as cloud storage and deliveries of products. We ensure that our third party service providers only use your personal data according to our specific instructions.

We may also share your personal data where necessary with our professional advisers including lawyers, bankers, auditors and insurers who provide relevant services to us.

Finally, if we choose to sell, transfer or merge parts of our business or assets, or acquire or merge with other businesses, we may share your personal data with those other businesses. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy policy.



Transferring your personal data outside of the United Kingdom (the "UK")

We do not transfer your personal data outside the UK. If this changes, we will update this privacy policy.

If we do transfer your personal data outside the UK, we will ensure that it is given the same level of protection that it would receive in the UK.

Keeping your personal data safe

We take the security of your personal data very seriously and have put in place technical and organisation measures to help keep it safe from unauthorised access or disclosure as required by law and in accordance with good industry practice. For example, all information you provide to us is stored on our secure servers.

Retention of your personal data

We'll only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your rights:

- You may request the correction of inaccurate personal data.
- You may request of copy of the personal data we hold about you.
- You may ask us to permanently delete some personal data in accordance with applicable laws.
- You can ask us to have the personal data that you've provided to us provided to you in a structured and commonly-used electronic format.
- You can ask us to restrict certain personal data we process about you, or object to our using it for direct marketing (if we do so).
- If we are processing your personal data with your consent as our lawful basis, you may withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of our processing your data prior to withdrawal.
- You also have the right to complain about our use of your personal data. You can contact the Information Commissioner's Office via their website: https://ico.org.uk/concerns/ or by calling 0303 123 1113.



We would always welcome the opportunity to answer any questions or complaints in the first instance, before they are made to the Information Commissioner's Office. If you have a complaint, please let us know using the details in the Contact section below.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. This policy was last updated on 16/10/2024.

Contact

Questions, comments and requests regarding this privacy policy should be addressed by email to <u>seckford@seckfordiwnes.co.uk</u>