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## PRIVACY & COOKIES POLICY

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### BACKGROUND:

Griffiths Brothers understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

Griffiths Brothers Distillery Ltd is a limited company registered in England under company number 10171197.

Registered & main trading address:

Griffiths Brothers Distillery Ltd

Unit 8, Penn Street Works

Amersham

Buckinghamshire HP7 0PX

VAT number:273703600

Data Protection Officer: Alex Griffiths

Email address: [info@griffithsbrothers.com](mailto:info@griffithsbrothers.com)

Telephone number: 01494 713955

Postal address: Griffiths Brothers Distillery Ltd, Unit 8, Penn Street Works, Amersham, Buckinghamshire, HP7 0PX.

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- j) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

## 5. **What Personal Data Do We Collect and How?**

If you buy from us or sign up to our email list, we may collect and hold some or all of the data listed below. We do not collect any 'special category' or 'sensitive' personal data.

- Identity & Contact information including name, address and email
- Payment information including card details and bank account numbers
- Profile information including your purchase history

## 6. **How Do You Use My Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. Any data we collect from you is used to either, process or deliver your order or to communicate with you regarding your order. We will only use your personal data for the purpose(s) for which it was originally collected.

If you have opted in to our email list, we may use your email address for marketing purposes, which may include contacting you by email, text message or post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam and will always be able to opt out at any time.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. **How Long Will You Keep My Personal Data?**

We keep your information on our databases until you ask us to delete it or for as long as it is relevant. That means we will delete it if you have not interacted with us for a while and we believe you have no intention of doing so in the future.

The exact time period for this is kept under constant review.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so

## 9. **Do You Share My Personal Data?**

We may share your personal data under the following circumstances:

- In carrying out our business, including our obligations to you, we may share your Information with other trusted third-party service providers, such as our payment service providers, our couriers, email broadcasters and marketing agencies. Such providers are required under their data processing agreements with us, to handle your Personal Information in accordance with applicable laws and principles related to privacy and data protection. In all instances, we share only the minimum information required.
- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal

proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### **10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

We will respond to your subject access request within 28 days. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### **11. What Are Cookies and How Do You Use Them?**

Cookies are small text files that are placed on your computer by websites you visit. They collect data by tagging along with you while you browse. Like most websites, we use cookies – partly to provide basic web services and partly to help us monitor and track website usage and improve your individual experience.

Some cookies are fundamental to the operation of the site, allowing you to navigate your way through it, add products to your basket and to purchase them. Cookies help to ensure the security of our site – and your account. We also use them to help us do things like remind you that you have items in your basket or to deliver relevant adverts to you.

A cookie in no way gives us access to your computer or any information about you other than the date you choose to share with us. You can remove cookies by changing your browser settings but please be aware that if you do, some features of our site may not be available to you.

For more information on cookies, please go to [www.allaboutcookies.org](http://www.allaboutcookies.org). If you want to find out more about how we use cookies, please contact us at the email or postal addresses shown in Part 12.

#### **12. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [info@griffithsbrothers.com](mailto:info@griffithsbrothers.com)

Telephone number: 01494 713955

Postal address: The Data Protection Officer, Griffiths Brothers Distillery Ltd, Unit 8, Penn Street Works, Amersham, Buckinghamshire HP7 0PX

#### **13. Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website, [www.griffithsbrothers.com](http://www.griffithsbrothers.com).