

## **Kate Negus Privacy Policy**

### **Protecting your privacy**

This notice was last updated: 22/5/18

#### **1. Introduction**

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Kate Negus uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

When you are using the Kate Negus website, Julia Andrews (Managing Director) is the data controller.

#### **2. Explaining the legal bases we rely on**

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

##### **Consent**

In specific situations, we can collect and process your data with your consent.

*For example, when you tick a box to receive email newsletters.*

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

##### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

*For example, if you order an item from us for home delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.*

##### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

*For example, we can pass on details of people involved in fraud or other criminal activity affecting Kate Negus to law enforcement.*

### **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

*For example, we will use your purchase history to send you or make available personalised offers.*

*We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand or develop new products/services.*

*We may also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.*

### **3. When do we collect your personal data?**

- When you visit our website, and buy products, or redeem vouchers from us on the phone, in person or online.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you create an account with us.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you enter prize draws or competitions.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services.
- When you've given a third party permission to share with us the information they hold about you.

### **4. What sort of personal data do we collect?**

- If you have a web account with us; your name, delivery address/ billing address, orders and receipts, email and telephone number.
- Details of your interactions with us through calls, online or visiting us at a trade show.

*For example, we may collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made etc.*

- Information gathered by the use of cookies in your web browser.

We will only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it is always your choice if you share these details with us and you can opt out at any time.

#### **5. How and why do we use your personal data?**

We want to give you the best possible customer experience. One way to achieve that is to get the best picture we can of who you are by combining the data we have about you. We then use this to offer you promotions, products and services that are most likely to interest you. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service. Of course, if you wish to change how we use your data, you can find details in the 'What are my rights?' section.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

*For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.*

#### **Here's how we'll use your personal data and why:**

- To process any orders that you make by using our website or at a show. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

*For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.*

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.

*For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations.*

- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, web, text or telephone** about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.

*For example, when a court order is submitted to share data with law enforcement agencies or a court of law.*

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences with us.

Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or a fitter visiting your home). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

## **6. How we protect your personal data**

We know how much data security matters to all our customers. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our website using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information is secured and tokenized to ensure it is protected.

## **7. How long will we keep your personal data?**

Whenever we collect or process your personal data, we will only keep it for as long as is needed for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Our customer data retention periods:

### **Orders**

When you place an order, we will keep the personal data that you give us for five years so we can comply with our legal and contractual obligations. In the case of certain products, such as Kate Negus bespoke products, we will keep the data for ten years.

## **8. Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties.

*For example, delivery couriers, to handle complaints, to help us personalise our offers to you and so on.*

**Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

**Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.

- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.
- Data insight companies to ensure your details are up to date and accurate.

**Sharing your data with third parties for their own purposes:**

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

*For example, if you enter a competition and tick a box agreeing that the company can send you promotional information directly. Or if we run a joint event with a company, and you agree to receive direct communications from them.*

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell the business and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer.

**9. Where your personal data may be processed**

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

**International orders**

If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to the business in the UK.

## **10. What are your rights over your personal data?**

### **An overview of your different rights**

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time as follows:

***To ask for your information please contact The Data Protection Officer, Kate Negus Saddlery, Old Abbey Barn, Bremhill, Calne, SN11 9HG or email [katenegus.com@btinternet.com](mailto:katenegus.com@btinternet.com) To ask for your information to be amended please contact our customer services team.***

If we choose not to action your request we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **11. How can you stop the use of your personal data for direct marketing?**

There are several ways you can stop direct marketing communications from us:

- Click the unsubscribe link in any email communication that we send you . We will then stop any further emails.
- Write to us at Kate Negus Saddlery, Old Abbey Barn Bremhill, Calne, SN11 9HG

Please note, you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## **12. Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling **0303 123 1113**.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

## **13. Queries?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection office who will be pleased to help you.