

## Privacy Policy

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we collect, process and look after your personal data when you visit or make a purchase from [www.benandhannahdunnnett.com](http://www.benandhannahdunnnett.com) (the "Site"). It will also tell you about your privacy rights and how the law protects you.

Ben and Hannah Dunnet Ltd of The Old Workshop Riverside, Perranarworthal, Truro, Cornwall, TR3 7NY is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please email us at [office@benandhannahdunnnett.com](mailto:office@benandhannahdunnnett.com)

### THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified either directly or indirectly.

- We may collect, use, store and transfer different kinds of personal data to include:
- Your identity and contact details;
- Information about how you use our Site and order from us;
- Your payment details;
- Your preferences in receiving marketing from us and our third parties and your communication preferences;
- Data from your laptop, computer, mobile telephone or handheld device when you access our Site including the type of device, a unique device identifier (for example, IMEI number, MAC address or mobile phone number used by the device), mobile network information, operating system, type of mobile browser, time zone setting, login information, photos, videos or other digital content and, profile data (includes username, password, interests, preferences, feedback and survey responses);

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to provide our services to you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- our day to day business dealings in providing our products to you;
- filling in forms or by corresponding with us by post, phone, email or otherwise;
- if you complete a survey or provide us with feedback;
- as you interact with our Site we may automatically collect data about your device, equipment, time zone, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies (Device Information);
- by using publicly accessible sources (such as Companies House);
- from analytics providers, advertising networks, and search information providers; and/or
- via a third party such as your bank or building society or other financial institutions when you pay for our services;

## **Why Do We Use Your Personal Information?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide the products you have ordered or are about to order;
- Where it is necessary to protect your vital interests if you are physically or legally incapable of giving consent;
- Where it is necessary for our legitimate interests (or those of a third party) which means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.
- Where we need to comply with a legal or regulatory obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on the details above.

## **Purposes For Which We Will Use Your Personal Data**

We have set out below a description of all the ways we plan to use your personal data:

To register you as a customer, to process and deliver your orders, to inform you of developments to our site or product range, to assess the quality of our services, manage payments, fees, and charges, to collect and recover money owed to us for our services, to manage our relationship with you, informing you of changes to our privacy policy or terms and conditions, to administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to make suggestions and recommendations to you about goods or services that may be of interest to you, to screen orders for any potential risk or fraud.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Payment Security**

### **How Do I Know My Credit Or Debit Card Details Are Safe On Your Site?**

We recognise that security is a major concern when shopping online. We have put a very secure system in place so you can feel completely at ease when shopping on our site.

When you make a purchase or attempt to make a purchase through the Site, we only collect information from you that is necessary to fulfil your order. This information includes your name, billing address, shipping address, payment information, email address, and phone number. We refer to this information as "Order Information."

When you make a payment on our Site you may provide payment information such as your credit/debit card or other payment details. We use secure form integration with a Payment Card Industry compliant third-party payment service (SagePay) to process all credit/debit card payments. This means that any transactions occur on the secure server of SagePay. All information you input is securely encrypted. No data concerning credit/debit cards is stored on our site. This does mean that you have to re-enter your card details every time you place an order with us, but this does ensure increased security.

## **Payments by sagepay**

This site is protected by Trustwave's Trusted Commerce program

You also have the option to pay through PayPal. Again, we do not store any credit/debit card/PayPal account information on our servers. You can view the SagePay and PayPal privacy policies here:

<https://www.sagepay.co.uk/policies/privacy-policy>

<https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

You have the option to create an account with the Site to make ordering quicker and easier. When creating an account you will be asked to give certain information, including your name, billing address, shipping address, email address and telephone number. This information is stored so that it is easier for you to make orders. When logged into your account you will be able to access and update the above information. You will also be able to view any previous orders.

We do not pass this information onto any third party.

## **Deleting Your Account**

You may request that your account is deleted by emailing us at [office@benandhannahdunnett.com](mailto:office@benandhannahdunnett.com) and we will delete your account and all its data.

Once deleted, your data cannot be reinstated.

## **How Do I Know Your Site is secure?**

We take the the safeguarding of collection, transmission and storage of data very seriously. We have 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, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We use industry standard Secure Sockets Layer (SSL) technology which allows for the encryption of personal information (our secure URL's begin with https:// as opposed to http://). The security symbol of your browser (often shown as a padlock) will help you confirm that you are communicating with a secure server.

Our site is protected by online security, which offers us receive real-time information on the strength of our protection.

When sharing data with our Site you should use a security-enabled browser.

If you do not use an SSL-capable browser then you are at risk of having data intercepted (this is standard good practice when accessing any Site on the internet and should be followed at all times).

Most web browsers can notify you if you change between secure and insecure communications or send information over an unsecured connection. We strongly recommend that you enable these browser functions to help ensure that your communications are secure. You can view the details of the security certificate of the Sites you connect to.

## **We collect Device Information using the following technologies:**

- “Cookies”
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

## **Use of Cookies**

“Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier.

Our cookies do not contain any personal information about you and are used only to determine your browser and user preferences for our site. This helps us to provide you with the best service and to make it easier when you shop.

You can, if you prefer, set up your internet browser to not accept cookies. You should still be able to use our site without having cookies enabled. However, this may affect the ability to carry out certain functions such as placing orders.

### **Sharing Your Personal Information**

As part of the services we provide to you, we may have to share your personal data with third parties such as:

- Third parties as part of our service to you such as self-employed contractors, payment processors, agents, IT providers (please see below for more specific details);
- The police or other law enforcement agencies if we have to by law or court order and such other lawful requests for further information;
- Professional advisers including lawyers, bankers, auditors, accountants and insurers;
- HM Revenue & Customs, regulators and other authorities; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do 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 our instructions. For example, as described above, we use secure form integration with SagePay to process credit/debit card payments securely.

Also, we use PayPal as another payment option.

We use Woocommerce to power our online store.

We also use Google Analytics to help us understand how our customers use the Site and this helps us to improve the user site experience. All of the IP data sent to google analytics is anonymised.

You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy?hl=en>

You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

### **Our Mailing List**

If you opt into our mailing list (by clicking on the link in the confirmation email) we will send you our newsletter by email. Our newsletter informs you about new products, designs and special offers. When you sign up for our email newsletter you will provide us with a first name and an email address. Your IP address will also be logged to prevent fraud.

Our emails are handled by Aweber on their secure servers which are based in the United States. Please note that this means that the above information will be transferred to the USA. Aweber are signed up to the EU-US Privacy Shield.

If you do not want to continue to receive offers and promotions by email, you can unsubscribe at any time by clicking on the link at the bottom of any newsletter email from us. You can also email us [office@benandhannahdunnett.com](mailto:office@benandhannahdunnett.com) to request removal from the list.

We may de-identify or aggregate some of the data you give us when opting into our email list in ways that do not personally identify you. This helps us better understand our existing customers and, in turn enable us to provide a better service for them. It also helps us market to potential new customers.

## **INTERNATIONAL TRANSFERS RELATING TO CUSTOMERS WITHIN THE EUROPEAN UNION.**

Your information will be held at our offices, by our service providers and in our IT provider's data centres which will mostly be in **London**. In order for us to provide our services to you, from time to time we may have to change where we store your data and this could involve sharing your personal data outside the European Economic Area (EEA). This could include where our service providers are based outside the EEA (for example our IT cloud services), if you are based outside the EEA, if there is an international element to the services we are providing or if one of our employees need to access our data remotely from outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
- Where the transfer is not repetitive, information is limited, the transfer is necessary for our legitimate interests and those interests do not override your own and we have put appropriate safeguards in place to protect your data.

Please note, some of the third parties we work with (including Google Analytics, WooCommerce and Aweber) also have servers based in the USA and so data will be transferred to their servers. These third parties have considerable site security in place; however, we cannot personally guarantee the safety of the data stored on their servers.

### **Will You Sell My Data On To Third Parties For Marketing Purposes?**

We will never sell on your personal information to a third party for marketing purposes.

### **How Long Will You Use My Personal Data For?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. This is usually 6 years.

### **Third-Party Links**

Our Site may include links to third-party Sites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not necessarily control these third-party Sites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy notice of every Site you visit.

### **EU Members' Rights and The GDPR**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You are entitled to:

- 1• 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 we hold about you and to check that we are lawfully processing it. This includes your right to have the data corrected, updated or amended. You will not normally have to pay a fee for this, but we will let you know if we feel that it is fair to charge a fee.
- 2• Object to and/or restrict processing of your personal data where we are 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. Please note that in some instances we may have to stop providing our services to you but we will notify you if this is the case.
- 3• Request the transfer of your personal data to you or to a third party, for example if you chose to use another business

to provide services to you.

- 4• Withdraw consent at any time where we are 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please contact us.

### **Minors**

The Site is not intended for individuals under the age of 18.

### **Changes To Our Privacy Policy**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

### **Right To Object and Complaints**

If you are unsure about any aspect of our use of your data or would like to object to any of the ways in which we process your data then please contact us (see below). We will endeavour to assist you in any way we can. However, should you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.

### **Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to discuss any aspect of our privacy policy, please contact us by e-mail at [office@benandhannahdunnett.com](mailto:office@benandhannahdunnett.com) or by mail using the details provided below:

Ben and Hannah Dunnett Ltd

The Old Workshop

Riverside

Perranarworthal

Cornwall

United Kingdom

TR3 7NY

01872 870880