

Privacy Policy

Introduction

Pixley Berries (Juice) Ltd is committed to data protection and respecting of the privacy of the personal data of our customers, business partners, officers and employees. We will at all times make sure that we keep the personal data provided to us secure and steps are taken to prevent any unauthorised access to your information.

Personal data is defined as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. This means there is a wide range of identifiers which constitute personal data including name, location data, online identifiers etc.

What data do we collect?

Personal data will only be collected for specified, explicit & legitimate purposes. It will be adequate, relevant & limited to what is necessary.

We collect various information provided by yourselves via telephone, email and our website to enable us to process an enquiry, a quote or an order. Information such as contact details, address, account details, preferences, date of enquiry/order, payment information, goods or services purchased and other details relevant to our business relationship. This data may be used during the course of your use of our services and / or goods.

From time to time we may access publicly available information about you on the internet to assist in fraud prevention, for identity verification (such as to confirm we have the correct address details for you) and for marketing purposes.

We also look at your activity on our website, for example which products you are looking at, which pages are viewed, timing, location etc. A software feature known as 'cookies' may be used, these are small pieces of data that are stored on your hard drive when accessing a website. This data is processed for the purposes of analysing the usage of the website and services, this helps us to monitor and improve our website and services. This is carried out using Google console whose privacy policy can be found at: <u>https://policies.google.com/privacy?hl=en-GB&gl=uk</u>.

What do we do with your data?

All personal data will be collected & processed in a lawful, fair & transparent manner to protect the individual rights of the data subjects.

We use your data to fulfil any orders you place with us or orders we place with yourselves. We use your data for shipping, invoicing, processing payments, account set up, maintenance and general support. For ongoing account relationship such as to notify you of any changes to our products and services, and any price changes.



 Pixley Berries (Juice) Ltd
 Pixley Court Ledbury Herefordshire UK HR8 2QA

 t +44 (0)1531 670 228
 enquiries@pixleyberries.co.uk

 f +44 (0)1531 670 412
 www.pixleyberries.co.uk

 Registered office : Poolend, Nr Ledbury, Herefordshire. HR8 2RB.
 Company Registration Number: 6056562

To investigate any complaints that you may make. To provide evidence in any dispute or anticipated dispute between us. To obtain credit checks & credit references for the purposes of prevention of fraud, and risk management. For this we use Experian, their privacy policy can be found at: <u>https://www.experian.co.uk/legal/privacy-statement.html</u>. Financial transactions relating to our website and services are handled by our payment service providers Paypal. For more information on PayPal's privacy policy please visit <u>https://www.paypal.com/gb/webapps/mpp/ua/privacy-full</u>.

We may also use your data for marketing purposes which may mean that you will receive marketing communications from us, where consent has been provided and where you have not objected. This will include newsletters, company / product news, promotional offers etc.

We may disclose personal data to trusted third party providers & agents such as appointed sales agents, financial institutions who may process payments due to us and transport companies who carry out shipping, all of whom perform services on our behalf.

We may disclose personal data to our insurers and / or professional advisors. This will only be done to ensure that appropriate insurance cover is maintained, in managing risk, managing legal disputes or potential disputes and seeking professional advice.

We may disclose personal data to any government departments, public body or third party where we believe in good faith that the law requires this in the interests of public health & safety, to protect rights, property, or safety of Pixley, its employees or others.

How do we manage your data?

Personal data will be adequate, relevant and limited to what is necessary and will not be stored longer than necessary.

Personal data will be as accurate as possible and kept up to date. Pixley Berries will take every reasonable step to erase or rectify inaccuracies without delay. If at any time you want to talk to us about your data, for example if you spot an error or if you want to change how we market to you, please contact us at <u>enquiries@pixleyberries.co.uk</u>.

<u>Consent is optional.</u> You can choose to opt out of receiving direct marketing information from us at any time by contacting us at <u>enquiries@pixleyberries.co.uk</u> we will then update our records. You can also click on the unsubscribe link in any promotional emails. We use Wix, who host our website, to manage the email marketing subscriber lists and send emails to our subscribers, their privacy policy can be found at <u>https://www.wix.com/about/privacy</u>.

Legal basis for processing data

Consent - provided by you to enable your personal data to be processed, for example to 'opt in' to receive marketing material.

Legitimate interest in the performance of a contract, and / or taking steps to enter into a contract, management of your account, processing payments, our relationship with you, and communicating with yourselves.

To comply with legal obligations including health & safety, environmental, anti-money laundering, terrorism prevention, complaints, investigations or litigation.

Internal business purposes such as record keeping, research, reporting, statistics, data security, to ensure the quality of our products & services, investigating and responding to queries, complaints, obtaining credit references and checks, changing our pricing, debt collection, fraud detection, prevention, risk management, recruitment & training of our personnel, protecting our rights, property & safety (and that of others).

Retaining personal information

We retain personal information for no longer than is necessary in relation to the purposes it was collected. We will take into account legal obligations where we are required to retain certain data for a specific period of time; statute of limitations under applicable law; (potential) disputes; guidelines issued by relevant data protection authorities. Where consent is withdrawn or there is no legitimate purpose for processing then the data will be destroyed securely.

Data Security

We will at all times keep your personal data secure, measures are in place to prevent any unauthorised access, alteration and disclosure of your information.

We use reasonable security measures to protect personal information on our website such as internet standard encryption technology (SSL) to encode personal information sent to us via our website. However, please note that we cannot guarantee complete security of information passed over the internet. Company computers all have up to date anti-virus software and are all accessed via individual complex passwords. The company site is locked when unmanned and a security system is in place.

Amendments

We may update this policy from time to time. New versions will be published on our website.

Your rights under data protection law:

- a) The right to be informed
 - a. You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights.
- b) The right to access
 - a. You have the right to ask us to confirm whether or not we process your personal data and have access to it if we do. We would respond within one month. We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information.

- b. There is not normally a fee for this access request, however if the request is manifestly unfounded or excessive, we reserve the right to charge a fee to cover administrative costs.
- c) The right to rectification
 - a. You have the right for any inaccurate information we hold about you to be rectified or completed.
- d) The right to erasure
 - a. You have the right to have the personal data that we hold about you erased. There are certain circumstances which may not enable erasure such as compliance with legislation, establishing, exercising, or defending legal claims or freedom of expression.
- e) The right to restrict processing
 - a. You have the right to have the processing of your personal data restricted. Your data will be retained but we are not able to use it further. Or to ask us to suspend processing your data.
- f) The right to data portability
 - a. Where data is being processed using automated means, you have the right to request a copy of your personal data to re-use with another service or business. This does not currently apply, as we do not use automated means to process data.
- g) The right to object to processing
 - a. You have the right to object to your personal data being processed. On receiving this request, we will stop processing your data, unless we can demonstrate legitimate grounds to continue processing which override your objection.
- h) The right not to subject to automated decision-making including profiling.
 - a. You have the right not to be subject to a decision based solely on automated processing which significantly impacts on you. This does not currently apply as we do carry out automated decision making.
- i) The right to complain to Information Commissioner's Office
 - a. If you think that our processing of your personal data infringed data protection laws, then you can lodge a complaint with the ICO.
- j) The right to withdraw consent.
 - a. You have the right to withdraw your consent for us to process your personal data at any time.

More information about your legal rights in respect of personal information can be found on the Information Commissioner's Office website: <u>https://ico.org.uk/for-the-public/</u> or contact the Citizens Advice Bureau.

If you have any queries, regarding this policy please contact us at <u>enquiries@pixleyberries.co.uk</u>