

# **R A OWEN AND SONS**

## **Privacy and Cookies Policy**

**The Data Controller is R A Owen and Sons (referred to in this policy as “we” or “us” or “R A Owen and Sons”).**

Last Updated: 25<sup>th</sup> July 2018

### **Our Promise to You**

Looking after your personal data is important to us. Your privacy matters to you – and it matters to us. We want you to be confident that any personal details you provide us are secure and to fully understand how we are using the data to improve your experience.

This policy sets out how R A Owen and Sons collects, uses and protects personal data. You will find information on:

- What personal data we collect
- How and why we collect personal data
- How we use your personal data, including when and why we share it both internally and with other businesses.

This policy applies if you use any of our services, including in-store shopping, online shopping (including our own website and third-party platforms), purchases by phone and customer enquiries.

On our website or social media platforms, you may find links to external websites operated by other organisations. If you use these links please note they will have their own privacy policy for you to read. We do not accept any liability for the websites of other organisations.

The term "Personal Data" refers to personally identifiable information about you, such as your name, date of birth, telephone number, e-mail address or mailing address.

The terms "you" and "your" when used in this Privacy Policy means any user of this website and/or account holder at R A Owen and Sons.

### **Notification of changes to this Privacy Policy**

This website is continually improved by adding new functionality and features and by improving and adding to existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, data practices will change from time to time. If data practices change, such changes will (as soon as practicable) be posted on this website to notify you of the changes. You should check this page frequently.

You will understandably have a concern about privacy. Your privacy is respected by us and your personal information is treated with the highest standards of safety, security and

confidentiality. To better protect your privacy, this notice explains manual and online information practices and the choices you can make about the way your information is collected and used by R A Owen and Sons manually and on this website. If you have questions regarding this Policy, you may direct them to [colin@raowenandsons.co.uk](mailto:colin@raowenandsons.co.uk) or to the Data Protection Officer based at Minafon, Llandinam, Powys SY17 5DG

### **Collection of Personal Data including e-mail addresses**

Information is collected about you with the intention of making products and services on this website more efficient and customized to you. You are free to browse this website without revealing any personal information about yourself. However, once you provide your personal information, you are not anonymous.

The information you provide will be collected and stored. You may use this website to register to receive additional information or services. When you complete an enquiry form or open an account with us, you will be asked for contact information like your name, home address, e-mail address and telephone number(s).

The information that you provide is sometimes supplemented with information that is received from third parties. For instance, if inaccurate post codes are received, third party software may be used to fix them.

### **Use of Personal Data**

The purposes for which Personal Data is collected, processed and used include the following:

- To respond to and administer your requests and to fulfil your orders for products and services including processing payment (as is necessary for the performance of a contract between you and us and/or as is necessary for our legitimate interests.
- To improve products and services, make your experience more efficient and relevant and provide you with a personalised service, and communicate with you including responding to your queries.
- To administer this website.
- To undertake market research and statistical analysis, analyse and research website visitors' demographics, interests, and pages viewed based on the information provided during ordering, from server log files, or surveys.
- With your consent, to contact you from time to time with information of new products and services or events that may be of interest to you.
- If you are an account holder, assessing financial risks including by carrying out credit reference checks and credit scoring assessments as is necessary for the performance of a contract between you and us and/or as is necessary for our legitimate interests.
- To fulfil our obligations owed to a relevant regulatory body such as taxation authority or revenue service as is necessary for the performance of a contract between you and us and/or as is necessary for our legitimate interests.

Our legitimate interests as referred to above include our legitimate business purposes and commercial interests in operating our business in a customer focused efficient and sustainable manner, in accordance with all applicable legal and regulatory requirements.

We consider it is within our legitimate interests to send you information about our products and services for marketing purposes following our receipt of your explicit consent to contact you about those products and services via such methods as agreed with you our customer.

With consent, we will send you marketing about similar products and services by post, telephone, email, SMS, and through digital channels. Digital channels include social media and similar such digital marketing channels (see Social Media section below).

We may upload and match personal data you provide us with data you provide via social media and similar digital channels. This allows us to improve our knowledge of you and in return serve you with relevant marketing messages.

### **Opt-out choice**

If you do not wish to receive information and want to be removed from mailing lists in relation to this website, please send an e-mail to [colin@raowenandsons.co.uk](mailto:colin@raowenandsons.co.uk)

### **Anonymous data collected through this website**

In addition to the information collected as described above, technology is used to collect anonymous information about the use of this website. These technologies may include though are not limited to, Google Analytics such as 'Google Analytics Demographics and Interest Reporting'. These and other technologies may be used to track which pages of this website visitors view as well as to collate non-personal demographic information about our visitors. Technology may also be used to determine which web browsers visitors use. This technology does not identify you personally, it simply enables the compilation of statistics about website visitors and their use of this website.

This website contains hyperlinks to other pages on this website. Technology may be used to track how often these links are used and which pages on this website visitors choose to view. This technology is not used to identify you personally and it simply enables us to compile statistics about the use of these hyperlinks.

Such anonymous data is used to improve the content and functionality of this website and e-mail updates, to better understand clients and markets, and to improve services.

### **Disclosure of your Personal Data**

Your Personal Data will not be shared, sold or distributed with unrelated third parties, except under these circumstances:

- Personal Data may occasionally be transferred to third parties for further processing in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented.
- Personal Data will be transferred to third parties for further processing for the fulfilment of orders placed by you via this Web Site and to provide an after sales service.

- Third parties are engaged to perform services or functions to manage and improve this website, merchandising, marketing and promotional efforts, communications or other services. Those third parties include authorised contractors, consultants, legal advisors and other companies (collectively, "agents"). They only have access to personal information needed to perform their duties and may not share any personal information with others or use it for any other purposes than that which is contractually agreed. Where appropriate, before disclosing Personal Data to a third party, that third party is contractually required to take adequate precautions to protect that data and maintain confidentiality. Information about you may also be received from other sources (such as demographic information and purchase history) and it may be added to records about you in to make marketing efforts more efficient.
- The information in this website's databases may be shared or transferred to comply with a legal requirement, for the administration of justice, to protect your vital interests, to protect the security or integrity of the databases or this website, to take precautions against legal liability, or in the event of a sale, merger, reorganisation, dissolution or similar event.
- Where you have consented, your information may be disclosed to partners or other businesses who may contact you about their products or services that may interest you.
- During the purchase process, your information may be shared with certain intermediaries (e.g. UPS) strictly to process and ship your order.

### **Data integrity and security**

Personal Data in this website is maintained to a high standard of reliability and accuracy, to protect the privacy and security of the database. Personal Data will be kept only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. Our existing retention policy is currently under review.

Employees and third parties who have access to Personal Data have been trained to handle such data properly and in accordance with security protocols and strict standards of confidentiality. Any loss, misuse, unauthorised disclosure, alteration or destruction of data, and any such unfortunate occurrences, are prevented as far as reasonably possible, by reasonable and proportionate safeguards in order to protect your data.

### **Third party sites**

This website may contain hyperlinks to web sites operated by third parties. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. Such websites are controlled by third parties and as such you should review any privacy policy posted on any site you visit before using the site or providing any Personal Data about yourself. The information practices of those websites linking from or to this website are not covered by this Policy, and you are encouraged to remain cautious and vigilant before you disclose your personal information to others

## **PayPal**

Compliance with Data Protection Laws. Any personal data processed by PayPal and the merchant in connection with this Agreement, PayPal and the merchant will respectively each be a controller in respect of such processing. PayPal and the merchant agree to comply with the requirements of the Data Protection Laws applicable to controllers in respect of the provision of their respective services and otherwise in connection with this Agreement. For the avoidance of doubt, PayPal and the merchant each have their own, independently determined privacy policies, notices and procedures for the personal data they hold and are each a data controller (and not joint data controllers). In complying with the Data Protection Laws, PayPal and the merchant shall, without limitation:

1. Implement and maintain appropriate security measures in relation to the processing of personal data
2. Maintain a record of all processing activities carried out under this Agreement
3. Not knowingly do anything or permit anything to be done, which might lead to a breach by the other party of the Data Protection Laws.

## **Data access and corrections**

Upon receipt of your written request and enough information to permit identification of your Personal Data, such Personal Data held about you will be disclosed to you. Corrections, amendments or deletions to Personal Data that is inaccurate can be made and will be notified to any third-party recipients.

If you wish to access or correct your Personal Data, please write to us at R A Owen and Sons, Minafon, Llandinam, Powys, SY17 5DG or via email [colin@raowenandsons.co.uk](mailto:colin@raowenandsons.co.uk).

You will not be charged for a correction request, however, for all other requests, you may be charged a fee. Requests to delete Personal Data are subject to any applicable legal and ethical reporting or document retention obligations. However, all requests will be handled in accordance with the Data Protection Act 1998 and GDPR.

## **Transfer of Personal Data abroad**

Personal data which you submit to this website may be processed in a country other than the UK but steps are taken to ensure that your Personal Data is kept secure by contractual and technical means.

However, the Internet is made up of many international connections. If you are visiting this website from a country other than the country in which its server is located (currently UK), the various communications will necessarily result in the transfer of information across international boundaries. By visiting this website and communicating electronically, you consent to these transfers.

## **Governing law**

This Privacy Policy forms part of the website Terms & Conditions and as such shall be governed by and construed in accordance with the laws of England & Wales. You agree to submit any dispute arising out of your use of this website to the exclusive jurisdiction of the courts of England & Wales.

## **Questions**

If you have further questions about this Privacy Policy or comments on how this website can be improved, please do not hesitate to send an email to [colin@raowenandsons.co.uk](mailto:colin@raowenandsons.co.uk).

## **Cookies and IP Address**

To collect the anonymous data described in the preceding paragraph, temporary "cookies" may be used. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. An example of a Cookie that we use is the 'Google Analytics' cookie which aids our internal reporting. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not.

IP address may also be used to help diagnose problems with this website's server and to administer this website. An IP address is a numeric code that identifies your computer on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information, such as determining how many visitors are from outside of the UK.

# **COOKIE POLICY**

Most websites you visit will use cookies to help customise your experience. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

## **Use of cookies on our website**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to enable us to tailor aspects of it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Third party cookies**

We sometimes embed video content and photos from websites such as YouTube and flickr. Pages with this embedded content may present cookies from these websites. Similarly, when you use one of the share buttons on our website, a cookie may be set by the service you have chosen to share content through. You should check the relevant third-party website for more information about these cookies.

## **How to manage cookies**

If you wish to restrict, block or delete cookies from our website - or any other website - you can use your browser to do this. Each browser is different so check the 'Help' menu of your browser to learn how to change your cookie preferences.

Please bear in mind that if you do this, certain personalised features of this website cannot be provided to you.

