

Privacy Policy

We collect and process personal data relating to our customers, members and visitors in order to manage the Loyalty Scheme operated by Cranborne Garden Centre. We are committed to being transparent about the collection and use of data to meet data protection requirements.

What we collect:

When you sign up to the Loyalty Scheme, we may collect:

- Your name
- Email address
- Postal address
- Date of birth
- Your transactional information from in-store purchases you make with us.

When you contact us or we contact you or you take part in promotions, or questionnaires about our services, we may collect:

- Personal data you provide anytime you contact us about our services (for example, your name and contact details), including by phone, email or post or social media
- Details of which emails and digital communications we send to you that you open, including any
 embedded links that you click on
- Your feedback and contributions to customer surveys and questionnaires.

When you use our free Wi-Fi we may collect:

• Your computer or mobile device's IP address.

When you visit our website, or interact with us via social media:

- Your IP address and browsing preferences and choices,
- Your name and username and any comments that you make.

When you book in the Café, for an event or for delivery we may collect:

- Your name
- Postal address

- Contact telephone number (mobile or landline)
- Email address

When you visit our premises we may collect:

• Your image or vehicle details if captured on one of our CCTV cameras.

How we collect information:

We may collect this information in a variety of ways:

- From you when you sign up to the Loyalty Scheme.
- From you when you sign up to email communications.
- From you when you contact us or interact with us by phone, email, post, or through social media.
- When you make a Café or event booking with us.
- When you use our free Wi-Fi.
- When you visit our website.
- If you or your vehicle passes within the field of view of one of our cameras.

Data will be stored in a range of different places, primarily on the customer management section in our retail system, and in other IT systems (including email).

Why we collect it:

In order to make our services available to you:

- We need to process your personal data to enter into a membership agreement with you and to meet our requirements and exercise our rights under that agreement.
- In some cases, we need to process data to ensure that we are complying with our legal obligations. For
 example, we have to keep a record of IP addresses using our Wi-Fi connection in accordance with the
 Investigatory Powers Act 2016.
- We process your personal data for our legitimate interests when you book the Café or for an event with
 us to keep a record of who is attending and to contact you if there is any alteration to your booking.

To manage and improve our products and services:

- Where our use of your information is for the purposes of our legitimate interests we have made sure that your information, and your rights in relation to that information, are protected. For example, we may rely on this legal basis if we use your information to understand and improve our products or services, to help find out what products and services are most likely to interest you, to send you information and offers for these products or services, or to ensure that the Loyalty Scheme and its related services are delivered and used in accordance with the law and the terms and conditions that apply to them.
- We use cookies and similar technologies on our website to improve your customer experience. For more
 information about cookies please see the cookies policy on our website.

Personalise your experience:

- Where we have your consent, we will use your information for marketing to you by email in accordance with your data choices.
- Where we rely on consent to use your information, you have the right to withdraw that consent and your details at any time. Please see the 'What are my rights' section of this policy for more details.

Contact and interaction with you:

• If you contact us about our services, we will use your personal data to provide clarification or assistance in response to your communications.

To protect our customers, staff and premises:

 It is also in our legitimate interests to operate CCTV for the protection of our property, staff, and customers.

How we use your information:

We process your personal data in order to:

- Operate the loyalty scheme in the collection and redemption of points, provide other scheme-related services and ensure that the applicable terms and conditions are observed;
- Use the information available to us to send you the most relevant information, offers, or surveys for the products or services which we believe are most likely to interest you;
- For maintaining the security of our property and premises and for preventing and investigating crime;
- Respond to your communications with us;
- Manage your booking(s) with us;
- Keep a record of your browsing preferences and choices in order to enhance your customer experience.
- Record your IP address in accordance with UK law.

Who we pass this information on to:

We share your data with third parties service providers that process data on our behalf such as for the provision of IT systems and services under our instruction. This includes:

- Our email distribution system MailJet, which is based in Sweden;
- Our retail management system, based in the UK;
- Third party providers (Google) for the management of cookies and similar technologies on our website, based in the US;
- Offsite back up of information at secure data centres in the UK.

We may also share personal data with other organisations:

• If the law or a public authority says we must share the personal data;

- If we need to share personal data in order to establish, exercise or defend our legal rights;
- To an organisation we sell or transfer (or enter into negotiations to sell or transfer) our business or any of our rights or obligations under any agreement we may have with you to.

How we protect your data:

- We take the security of your data seriously. We have internal policies and controls in place to ensure
 that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our
 employees in the proper performance of their duties.
- Where we engage third parties to process personal data on our behalf, they do so on the basis of written
 instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and
 organisational measures to ensure the security of data.
- Where data is transferred outside of the European Economic Area by third party suppliers we have ensured that specific safeguards are in place to protect the personal data of individuals and that your rights are preserved. Our suppliers are either members of an EU approved certification mechanism or we have a specific agreement in place which incorporates the EU's standard contractual clauses on data transfer.

How long we keep your data for:

- The personal data that you provide when you register for the Loyalty Scheme or newsletter, together with any updates you make to that information, is held for the duration of your membership with the scheme or mailing list.
- We retain IP addresses for one year as required by UK legislation.
- Images captured by CCTV are kept for a period of up to 30 days whilst they are pending review or further investigation. On occasion there may be a need to keep images for longer, for example where a crime is being investigated. In such instances images may be kept for a period of up to 3 years.
- Booking information is kept up to and including the date of the booking and then it is deleted or confidentially destroyed.

Your rights:

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Ask us to change incorrect or incomplete data;
- Ask us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data based on grounds relating to your specific situation; to receive
 from us the personal data we hold about you which you have provided to us, in a reasonable format
 specified by you, including for the purpose of you transmitting that data to another data controller; and
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

^{*}Please note that none of these rights are absolute and we may be entitled to refuse requests where exceptions apply*

What if you do not provide personal data?

- If you do not provide us with the personal data we need to operate our Loyalty Scheme, we will not be able to provide all services to you. You may still hold a Loyalty card and collect points but:
 - O Without an email address, you will not be able to access special offers or event notifications. You will not be able to receive coupons or vouchers by email.
 - Without your date of birth we cannot offer you a birthday gift each year (where this applies).
 - Without your postal address, we cannot tailor our communications to your location.
- Some cookies on our website are necessary for its proper performance and disabling these will limit the
 use of all the features on our website. You can disable other cookies but this may affect your customer
 experience.

Automated decision-making:

• Relevant offers may be generated using an automated decision-making process which takes into account the information you have provided to us as part of your participation in the scheme.

Contact information and further advice:

The Secretary and Keeper of Records of the Cranborne Garden Centre is the registered Data Controller.

If you would like to contact us please do so via the of the method below:

The Data Protection Administrator, Cranborne Garden Centre, Cranborne, Dorset BH21 5PP.

If you have concerns about the use of your personal data, the Information Commissioner's Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: www.ico.org.uk, or their helpline on <u>0303 123 1113</u>, or in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF