#### Peter Watts Wines Privacy & Cookie Policy May 2018

#### 1. Introduction

- 1.1 We occasionally modify our Privacy Policy and will post those changes on this page so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. Please check our Privacy Policy frequently to ensure that you are aware of any changes.
- **1.2** We are committed to protecting and respecting your privacy.
- 1.3 This Privacy & Cookie Policy (together with our Terms of Use and Trading Terms (if applicable)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- **1.4** For the purpose of European Union Data Protection legislation, we (as defined and detailed in our Site) are the data controller.
- 2. Information we may collect from you and we use it.
- **2.1** We may collect and process the following data about you when visiting our shop:
  - **2.1.1** details of transactions you carry out through our Site and the fulfilment of your orders;
  - 2.1.2 information that you provide by filling in forms on our Site, including but not limited to, information provided at the time of registering to use our Site, subscribing to any service, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by us;
  - **2.1.3** communications you send to us, for example to report a problem with or submit a comment regarding our Site; and
  - 2.1.4 details of your visits to our Site, including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

# 3. IP addresses and cookies

- 3.1 We may collect information about your computer, including, where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 3.2 For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Site and to deliver a better and more personalised service. They enable us to:
  - **3.2.1** estimate our audience size and usage pattern:
  - **3.2.2** store information about your preferences, and so allow us to customise our Site according to your individual interests;

- 3.2.3 speed up your searches; and
- **3.2.4** recognise you when you return to our Site.
- 3.3 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you use our Site. The "Help" menu of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. For more information about cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit the following website: <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>.

#### 4. What cookies are used on our Site

**4.1** The cookies we and our business partners use on our Site are broadly grouped into the following categories:

**Essential** – Some of the cookies on our Site are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our Site or which allows communication between your browser and our Site. Our cookie preference cookie described in the section "How can I reject or opt out of receiving cookies?" is also an essential cookie. You may not be able to use our Site without these cookies.

**Analytics** – We use analytics cookies to helps us understand how users engage with our Site. An example is counting the number of different people coming to our Site or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited our Site once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our Site was performing and improve it without these cookies.

**User Cookies** – We use cookies to improve your experience by remembering your preferences so we know how you like to use our Site. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our Site.

**Social Sharing** – We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to "like" or "tweet" about us or our products or services. Please see our "Third Party Cookies" section below for more details.

Interest-Based Advertising – You will have noticed that when you visit websites you will be shown adverts for products and services you may wish to buy. The money made by website owners for showing third party adverts on their websites often pays for the cost of running the website and therefore usually allows you to use the website without having to pay a registration or usage fee. To try and ensure that the adverts you see are relevant to you third party cookies may be used to collect information about the types of things that interest you, for example websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant. Please see our "Third Party Cookies" section below for more details.

### 5. Third party cookies

5.1 Some of the cookies described in the "What Cookies are used on our Site" section above are stored on your machine by third parties when you use our Site. Third parties may also read cookies on your browser to collect information or to serve

content or advertisements to you. We have no control over these cookies or how the third parties use them. They are used to allow that third party to provide a service to us, for example analytics. For more information on these cookies and how to disable them, please see:

- 5.1.1 Internet Advertising Bureau website at <a href="http://www.youronlinechoices.com/">http://www.youronlinechoices.com/</a> where you will be able to opt-out of receiving Interest-Based Advertising cookies from some of the third parties listed below; and/or
- 5.1.2 If you want to know more about how cookies work and how to manage or delete them, visit the World Wide Web Consortium's website: http://www.w3.org/Security/Fag/wwwsf2.html#CLT-Q10.

# 6. Data Storage Data storage

6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

### 7. How we process and store your information

- 7.1 The data that we collect from you is processed by staff who work either for us or for one of our service providers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.
- 7.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain features or parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 7.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Remember to close your browser when you have finished your user session. This will help to ensure that others do not access your personal information if you share your computer or use a computer in a public places such as a library or internet café.

## 8. Uses made of the information

- **8.1** We use information held about you in the following ways:
  - **8.1.1** to carry out our obligations arising from any contracts entered into between you and us, for example to fulfil your orders;

- **8.1.2** to provide you with information, products or services that you request from us or which we feel may interest you, where you have indicated that you wish to be contacted for such purposes by post, email, SMS, telephone or other means of electronic communication;
- **8.1.3** to ensure that content from our Site is presented in the most effective manner for you and for your computer;
- **8.1.4** to allow you to participate in interactive features of our service, when you choose to do so; and
- **8.1.5** to notify you about changes to our service.
- **8.2** We may also use your data, or permit selected third parties to use your data, to provide you with information about third party goods and services which may be of interest to you and we or they may contact you about these, where you have indicated that you wish to be contacted for such purposes by post, email, SMS, telephone or other means of electronic communication.
- 8.3 If you do not want us to use your data for direct marketing purposes, or to pass your details on to third parties for marketing purposes, please check or un-check (as directed) the relevant box situated on the form on which we collect your data.

#### 9. Disclosure of your information

- **9.1** We may disclose your personal information to any affiliated company within our group.
- **9.2** We may disclose your personal information to third parties:
  - **9.2.1** in the event that we sell or buy any business, assets or shares, in which case we may disclose your personal data to the prospective seller or buyer of such business, assets;
  - 9.2.2 if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or
  - 9.2.3 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions; or to protect our rights, property, or safety, or those of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### 10. Your rights

10.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing by checking or un-checking (as directed) certain boxes on the forms we use to collect your data or by following the unsubscribe link on any marketing emails we send you. You can also exercise the right at any time by contacting us using the details set out on our Site.

### 11. Access to your information

11.1 The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access

request may be subject to a fee not exceeding £10 to meet our costs in providing you with details of the information we hold about you.

# 12. Changes to this Privacy & Cookie Policy

12.1 We may update this Privacy & Cookie Policy from time to time so you may want to check it each time you give us personal information or look at or change your personal details on our Site.

### 13. How to contact us

13.1 If you have any questions, comments or requests regarding this Privacy & Cookie Policy, please feel free to contact us by using the details set out on our Site.