



VINTAGE 1947 LIMITED ("**We**") are committed to protecting and respecting your privacy.

This privacy policy for www.rarewinevintages.com (**Site**) (together with our terms of use <http://rarewinevintages.com/terms-use/> and any other documents referred to on it) sets out the basis on which we collect and process your personal data, including data you provide when you purchase products from us, make enquiries about products, and data you may provide through this Site when you sign up to updates or contact us.

This Site is operated by Vintage 1947 Limited (trading as Rare Wine Vintages). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 2018 and any Act that replaces it (the **Act**) and the General Data Protection Regulation (**GDPR**), the data controller is Vintage 1947 Limited of 63 Highgate High Street, Highgate, London N6 5JX and you may contact us with any queries about this privacy policy, including any request to exercise your legal rights (detailed at page 6 of this policy), by email to rww@rarewinevintages.com.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1. Information we may collect from you

We may collect and process the following data about you:

- information (such as your name, email addresses, postal address and telephone numbers (both landlines and mobile numbers)) that you provide to us by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise;
- information you provide when you subscribe to become a member and make an enquiry of a product through our Site. The information you give us may include your name, address, e-mail address and phone number;
- banking details to include sort code, bank account number for the purposes of payments of membership fees and purchasing products;
- if you provide a copy of your business card, we may use that information to contact you;
- IP Address information (see below);
- communications you send to us, for example to report a problem or to submit queries, concerns or comments regarding the Site or its content;
- as you interact with the Site we may automatically collect information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to



browse away from the page and any phone number used to call our customer service number (“**Usage Data**”); and

- we may receive information about you if you use other websites we advertise our services on or the other services we provide. We are also working closely with third parties (including, for example sub-contractors providing delivery services analytics providers, search information providers) and may receive information about you from them.

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 perform the contract we have or are trying to enter into with you (for example, to provide you with goods). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

IP Addresses

When you visit the Site, we may automatically collect additional information about your electronic device, such as the type of internet browser and operating system you use, any website from which you have come to the Site and your IP address (the unique address which identifies your computer on the internet) which is automatically recognised by our web server, for system administration (“**Technical Data**”). This information is only used to assist us in providing an effective service on the Site.

2. Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including the basis of legitimate interest
To register you as a new customer.	Personal data, including names, addresses, email address, telephone numbers.	(a) Performance of a contract with you. (b) Consent.
To manage our relationship with you which will include: (a) providing the agreed goods and products to you; (b) to provide you with information that you request from us;	Personal data, including names, addresses, email address, telephone numbers.	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to



<p>(c) notifying you about changes to our terms or privacy policy; and</p> <p>(d) asking you to provide feedback or take a survey</p>		<p>study how customers use our products/services).</p>
<p>To process and deliver your order including:</p> <p>(a) manage payments, fees and charges; and</p> <p>(b) collect and recover money owed to us</p>	<p>Personal data, including names, addresses, email address, telephone numbers, financial information.</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>Personal data, including names, addresses, email address, telephone numbers, Usage Data and Technical Data.</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.</p>	<p>Technical Data and Usage Data</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Technical Data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud).</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>Marketing and communications to make suggestions and recommendations about goods that may be of interest to you and to provide you with information about other goods or products we offer that are similar to those that you have already purchased or enquired about.</p>	<p>Personal data, including names, addresses, email address, telephone numbers, Usage Data.</p>	<p>(a) Consent.</p> <p>(b) Necessary for our legitimate interests (to develop our services and grow our business).</p>



To conduct the recruitment process for potential job applicants	Personal data, including names, addresses, email address, telephone numbers, employment history, education and qualification details, interview notes.	Necessary for our legitimate interests of keeping details of candidates for our internal compliance purposes.
---	--	---

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, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep information (including name, contact address, purchase history and invoices) about our existing customers who make purchases from us and suppliers for seven years after they cease being customers/suppliers for tax and regulatory purposes.

We will keep basic information about unsuccessful recruitment candidates for six months after the date of the interview.

Further specific information about our retention periods can be obtained by contacting us.

At the end of the retention period the data will be reviewed and unless there are valid legal grounds for retaining the data for any longer period, the data will be securely and permanently deleted, as set out in our Retention Policy document.

Cookies

Our Site uses cookies to distinguish you from other users of our Site. When you visit the Site, we use small text files called 'cookies' which are stored on your browser or hard drive of your computer to assist in personalising your browsing experience by displaying content that is more likely to be relevant and of interest to you and to help us improve our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy <http://rarewinevintages.com/cookie-policy/>.

Google Analytics

The Site uses Google Analytics, a web analytics service provided by Google Inc ("Google"), which is based outside the European Economic Area ("**EEA**"), to help us to analyse the traffic to the Site. The type of information collected includes the time of visit and the type of operating system you are using. This information is only used to assist us in providing an



effective service on the Site. Further information can be found at <https://policies.google.com/privacy/update?hl=en-GB&gl=uk> and our Cookie policy <http://rarewinevintages.com/cookie-policy/>

3. Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you. Our agents and contractors will only use your information as instructed by us and only to the extent necessary to perform their functions.
- Professional advisers acting as processors or joint controllers including lawyers and accountants based within the EEA who provided legal and accounting services.
- Service providers acting as processors who provide IT and system administration services.
- HM Revenue & Customs, regulators, fraud prevention agencies and authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- We use a third party provider Campaign Monitor, who is based outside the EEA, to manage our updates. For more information, please see **Campaign Monitor's privacy statement**.

We will get your express opt-in consent before we share your personal data with any company for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Vintage 1947 Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 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 of use <http://rarewinevintages.com/terms-use/> or apply our terms and conditions of supply of goods <http://rarewinevintages.com/terms-supply/> and other agreements; or to protect the rights, property, or safety of Vintage 1947 Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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.

External links

The Site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites. Please check these policies before you submit any personal data to these websites.

4. Where we store your personal data

All information you provide to us is stored on our secure servers. Our email server is hosted by Rackspace in datacentres based in the United States. To help achieve an adequate level of protection for your data Rackspace is Privacy Shield certified.

We may also store your personal data on Dropbox who has servers located in the EU and the United States. To help achieve an adequate level of protection for your data where it is held outside of the EEA Dropbox is Privacy Shield certified.

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.

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.

It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information if you use a shared computer or a computer in a public place.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Your rights

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

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.



- Right to withdraw consent.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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.

6. Changes to our privacy policy

We reserve the right to change this privacy policy from time to time by changing it on the Site. This privacy policy was last updated on 24 May 2018. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

7. Contact

Questions, comments and requests regarding this privacy policy are welcomed. Please submit these or any requests concerning your personal data by email to rwv@rarewinevintages.com or write to us at:

Vintage 1947 Limited
63 Highgate High Street
Highgate
London
N6 5JX

Thank you for visiting our site

Vintage 1947 Limited

Last updated: 24 May 2018