

PRIVACY NOTICE

This privacy notice sets out how EBRL uses and protects any information that you give us.

EBRL is committed to complying with the Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR) 2018, and our utmost concern is ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified you can be assured that it will only be used in accordance with this privacy notice.

EBRL may change this notice from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This notice is effective from 1st February 2019.

SUPERVISORY AUTHORITY

We are registered as a data controller under the terms of the Data Protection Act 1998 and the GDPR 2018 regulations with the UK Information Commissioner's Office, and our information can be found on the UK data protection register under the name of EBRL, Reference: *****

YOUR RIGHTS

With the introduction of the General Data Protection Regulation as of 25th May 2018, the data subject has been afforded new rights in relation to the protection of their personal information. A brief explanation of these is outlined below.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

THE RIGHT OF ACCESS BY THE DATA SUBJECT

You are afforded the right to obtain from EBRL confirmation as to whether or not personal data concerning you is being processed, and the right to obtain a copy of all the information we hold pertaining to you.

THE RIGHT TO RECTIFICATION

You have the right to rectify inaccurate personal data pertaining to you and to have additional incomplete personal data completed. If you believe any of the information we hold about you is inaccurate please contact us and we will aim to correct the information as soon as possible. Any problems that can't be rectified immediately will be addressed without delay.

THE RIGHT TO ERASURE

You have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed

- the data subject withdraws from the processing
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing
- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation
- the personal data have been collected in relation to the offer of information/services

This shall not apply where one of the following grounds applies:

- We are exercising the right of freedom of expression and information
- For compliance with a legal obligation for reasons of public interest
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- For the establishment, exercise or defence of legal claims

THE RIGHT TO RESTRICTION OF PROCESSING

You also have a right to restrict our processing of your data where any of the following grounds apply:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject

If you would like to cease all communications from EBRL, we would recommend you exercise your right to restriction rather than ask us to erase your data, as this will allow us to prevent future mailings if your details are passed to us by an external data pool at a later date.

THE RIGHT TO DATA PORTABILITY

You have the right to request the information that we hold on you be supplied to you in a portable format. This will be supplied in a format readable by most standard spreadsheet software and reasonable requests for alternative data formats will be complied wherever possible.

THE RIGHT TO OBJECT

You have the right to object to your personal information being processed by us. If you object to us processing your data for profiling or direct marketing purposes, then let us know and we will stop sending you marketing material and inform any relevant 3rd parties of a removal request. If you object to us processing your data in any way, please let us know and we will completely remove your personal information from our database.

WHAT WE COLLECT

We may collect the following information:

- Name
- Contact information including email address
- Demographic information such as postcode, preferences and interests

- Order history
- IP Address

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Nobody likes "spam" so we do not share your email address with anybody else.

We do not store your payment card details.

Our website is not intended for the use of children under the age of sixteen. We ask that children do not provide personal information through our website. If we become aware that we have collected personal information from a child under the age of sixteen, then we will delete that information from our records.

OUR LEGAL BASIS FOR DATA COLLECTION

Our legal basis for data collection relies on our legitimate interest as outlined in Article 6.1 of the GDPR 2018.

WHAT WE DO WITH THE INFORMATION

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping

- We may use the information to improve our products and services
- We may periodically send promotional emails and call about new products, special offers or other information which we think you may find interesting using the email address and telephone number which you have provided

Our communications are designed to tell you about the benefits we can offer, so that you have exclusive access to our best deals. We use the information we have about you to tailor the content and try to ensure that the offers are as relevant to you as possible. If you would prefer us not to use your information, please contact a member of the team on 01889 577533 or email us at gdpr@ebri.co.uk

PROFILING

We may use data profiling in order to better tailor our communications to you. In this way, you can be kept abreast of relevant information and products that we believe you may be interested in, based on your prior order history. If you object to this profiling, please contact a member of the team on 01889 588481 or email us at gdpr@ebri.co.uk

SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

In the unlikely event of a data breach that puts you at risk, we shall notify both the UK Information Commissioner's Office and you with details of the breach without due delay.

RETENTION OF DATA

We retain your information for as long as you hold an account with us. This allows us to maintain an ongoing relationship with you, complete future orders and query your order history. We follow a data retention schedule in order to retain the minimum amount of personal data held at any given time.

HOW WE USE COOKIES

This site uses cookies. By continuing to browse this site you are agreeing to our use of cookies.

A cookie is a small file which can be placed on your computer's hard drive. 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. Cookies let us know when you visit our website, keep track of how you use the shopping basket, and analyse web traffic.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor 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.

3 groups of cookies are used on the EBRL website:

- EBRL session cookie (expires at the end of the session) - this is used for transactional purposes to remember the content of the customers' shopping basket as they browse around the site.
- Google Analytics cookies - these are used to help understand customer behaviour and the performance of the website. For example, how many customers visit the site, how long they spend on the site, what devices are used for browsing, which other websites link to the EBRL website and how our marketing campaigns are performing.
- Other third-party cookies - these may be used to help us and our advertisers to deliver advertisements (both on this website and elsewhere) which are relevant to you and your interests. They can also remember that you have visited our website, limit the number of times you see an advertisement and help measure the effectiveness of advertising campaigns. They can monitor and record your activity across a number of websites within a network. These cookies can remember that you have visited a website and this information (together with the other information collected) may be shared with other organisations such as advertisers in the advertising network to enable them to create a profile of your interests.

Third Party Cookie Integration: We may use third party companies to provide advertising services and/or to collect certain information when you visit and interact with our website. These third-party companies may collect and use non-personally identifiable information (e.g., click stream information, browser type, time and date, subject of advertisements clicked or scrolled over) during your visit to this website [and/or other websites] in order to provide advertisements about goods and services likely to be of greater interest to you. These third-party companies may use cookies and

other technologies to recognise your browser to collect and record information about your web surfing activity including your activities on this website. You may visit the European Interactive Digital Advertising Alliance at <http://youonlinechoices.eu> to learn more about interest-based advertising, or to opt out of receiving advertisements tailored to your interests on your browser, from their respective members and participants.

First Party Cookie Integration: We may also use technologies, such as our own cookies, to provide you with relevant online display advertising tailored to your interests. To opt out of our cookies used for this online advertising please contact a member of the team on 01889 588481 or email us at gdpr@ebri.co.uk

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- During any calls we might make you will be asked if you are happy to proceed with the call if you answer 'no' we will no longer call you
- If you do not wish you to receive any further e-mails, please use the 'unsubscribe' button at the bottom of the sent e-mail

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting a member of the team on 01889 588481 or email us at gdpr@ebri.co.uk

DATA SHARING

We may use personal information provided by you in order to conduct appropriate anti-fraud checks. Personal information that you provide may be disclosed to a credit reference or fraud prevention agency, which may keep a record of that information.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting, if you tell us that you wish this to happen.

Please note that your data could also be sent outside the EEA (e.g. to the USA) for marketing and customer profiling purposes. If any data is transferred outside of the EEA, the relevant companies have provided assurances of appropriate safeguards being in place for the transfer (e.g. relevant companies in the USA are signed up to the Privacy Shield).

If you do not wish us to share this information, or to update your preference at any time please contact a member of the team on 01889 588481 or email us at gdpr@ebri.co.uk

PRIVACY INFORMATION REQUESTS

Please direct all information or privacy requests or complaints to gdpr@ebri.co.uk . In the event that a privacy request is made, we will give you a confirmation of receipt of your request and respond to the request within one month.