

## Vine Trail Limited : Privacy Policy

### What is this privacy notice for?

Vine Trail Limited respects your privacy and is committed to protecting your personal data. This notice informs you as to how we look after your personal data and tells you about your privacy rights and how the law protects you. It explains how we collect and process your personal data, including any data you may provide when you place an order, register as a customer, sign up to our newsletter emails or enquire for more information.

The Jargon Buster explains the meaning of some of the terms used.

It is important that you read this together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This notice supplements the other notices and is not intended to override them.

If you have any questions including any requests to exercise your legal rights, please contact us using the details set out below.

Vine Trail Limited

Name of Data Protection officer: Jen Green

Email address: [jen@vinetrail.co.uk](mailto:jen@vinetrail.co.uk)

Postal address: The Poland Building, c/o Aardman Animations, Gas Ferry Road, Bristol, BS1 6UN

Telephone number: 0117 921 1770

### Jargon Buster

#### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. For example this would be an order through the website requesting to purchase products.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



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**Consent** means where you have given us clear consent for us to use your personal data to communicate with you, by your preferred method of communication (e.g. email, post, phone).

## THIRD PARTIES

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Specific third parties we work with to provide you with a service:
  - Priority Express Couriers Ltd, (Registered office - Unit 5 (D2), St Philips Central Albert Road, Bristol, BS2 0XJ) a courier service we will share Identity and Contact Data with so they can make a delivery to your premises and contact you if there is any query regarding delivery. We are satisfied that Priority Express Couriers Ltd has put in place appropriate measures in respect of data privacy; [Privacy Policy](#)
  - We share your personal data with Campaign Monitor (Campaign Monitor Pty Ltd.) for the purposes of creating mailings. This will involve transferring your data outside the European Economic Area (EEA). The Services are provided, supported, and hosted in the United States. For more information about transferring data outside of the EU, see EU website [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en) Vine Trail is the data controller of your personal data, Campaign Monitor is a data processor and we are confident that Campaign Monitor safeguards data in accordance with European Union data protection law. For further details, read their Privacy Notice for Subscribers (our customers): <https://www.campaignmonitor.com/policies/#priv-section-3>
  - We may share your personal data with Eventbrite, Inc., a Delaware corporation, with its principal place of business at 155 5th Street, Floor 7, San Francisco, CA 94103, Reg. No. 4742147 ("Eventbrite US"). We use their service to manage and administrate events. We are satisfied that they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: [EU-US Privacy Shield](#) and Eventbrite's website [https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy)

## What data do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, age and



gender.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this notice.

We do not, collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

## What If I don't provide you with personal data?

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 services). In this case, we may have to cancel providing you with a service you have with us but we will notify you if this is the case at the time.

## What if my personal data changes?

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## How is my personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services in person by visiting our premises or completing a web form;
  - subscribe to our service or publications;



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- request marketing to be sent to you;
  - sign up for an event;
  - engage with us on social media;
  - apply to work with us as a member of staff; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
  - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources where you have given permission to the third party to share your data with us (you should check the third party's data privacy notice) or it is available publicly:
    - Technical Data from analytics providers such as Google based outside the EU;
    - We check on the credit worthiness of companies that we trade with using publicly available information on Companies House and using a third party reference agency Creditsafe. Companies House Privacy Policy can be found here <https://www.gov.uk/government/organisations/companies-house/about/personal-information-charter>  
Creditsafe Privacy Policy <https://www.creditsafe.com/gb/en/product/privacy-policy.html>

## How do we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have consented to us doing so.

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.



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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and to provide information about the products and services we offer	(a) Identity (b) Contact	(a) Performance of a contract with you or your organization (b) Your consent
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to take a survey  (c) Inviting you to events	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you or your organisation  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)  d) Your consent
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  (c) Your consent
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation )  (b) Necessary to comply with a legal obligation



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To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	a) Necessary for our legitimate interests (to develop our products/services and grow our business)  b) Your consent

## How do we use personal data in marketing?

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you registered for our online ordering service, and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any other outside company.



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You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

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.

## **Do you use cookies?**

Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you’re using to access our website ~~or apps~~ and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you’re using, what your device settings are, etc. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <http://www.vinetrail.co.uk/cookies>

## **Do you automatically process data?**

No we don’t use any form of automated data processing.

## **Can you change the purpose for which you use my data?**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **When might you disclose my data?**

We may have to share your personal data with the Third Parties (see Jargon Buster) or any Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out here.





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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.

## **Do you transfer my data outside of the UK?**

We share your personal data with Campaign Monitor (Campaign Monitor Pty Ltd.) for the purposes of creating mailings. This will involve transferring your data outside the European Economic Area (EEA). The Services are provided, supported, and hosted in the United States. For more information about transferring data outside of the EU, see EU website [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en)

Vine Trail is the data controller of your personal data, Campaign Monitor is a data processor and we are confident that Campaign Monitor safeguards data in accordance with European Union data protection law. For further details, read their Privacy Notice for Subscribers (our customers):

<https://www.campaignmonitor.com/policies/#priv-section-3>

and as EEA Residents <https://www.campaignmonitor.com/policies/#priv-section-5a>

We may share your personal data with Eventbrite Inc for the purposes of inviting customers to events, registering attendees and taking payment for tickets. This will involve transferring your data outside the European Economic Area (EEA). We are satisfied that they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

## **What data security measures are in place?**

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.

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.

## **How long will you use my personal data for?**

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.

In some circumstances:





- you can ask us to delete your data: see below for further information.
- we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## What are my legal rights?

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If



you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights set out above, please contact us.

## **Do I have to pay?**

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 would we 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.

## **How quickly do you 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.

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](http://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.

