

Privacy and cookies policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of visitors to and customers of our website www.howsamsmill.co.uk; in this policy we explain how we will handle your personal data.
- 1.2 This policy applies where we are acting as a data controller with respect to your personal data; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website "howsamsmill.co.uk", we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to G Howsam & Son Ltd. For more information about us, see Section 19.

2. The personal data that we collect

- 2.1 In this Section 2 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 2.2 We may process data enabling us to get in touch with you ("**contact data**") The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you. If you log into our website using a social media account, we may obtain elements of the contact data from the relevant social media account provider.
- 2.3 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you and/or our payment services provider Worldpay.
- 2.4 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is through our use of analytics tracking systems.

3. Purposes of processing and legal bases

- 3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2 **Operations** - We may process your personal data for the purposes of operating our website, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.

- 3.3 **Relationships and communications** - We may process contact data, account data, customer relationship data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of our relationships, enabling the use of our services, and the proper administration of our website, services and business.
- 3.4 **Direct marketing** - We may process contact data, account data, customer relationship data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 3.5 **Research and analysis** - We may process usage data and/or transaction data for the purposes of researching and analysing the use of our website and services. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.
- 3.6 **Record keeping** - We may process your contact details for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 3.7 **Security** - We may process your contact details for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 3.8 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

4. Providing your personal data to others

- 4.1 Your personal data held in our website database will be stored on the servers of our hosting services providers Bluepark Solutions Ltd.
- 4.2 Financial transactions relating to purchases on our website www.howsammill.co.uk are handled by our payment services providers, "Worldpay from FIS" We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.fisglobal.com/en/privacy>

- 4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:
- (a) contact data will be retained for a minimum period of *6 Years* following the date of the most recent contact between you and us, and for a maximum period of *10 years* following that date;
 - (b) account data will be retained for a minimum period of *6 years* following the date of closure of the relevant account, and for a maximum period of *10 years* following that date;
 - (c) customer relationship data will be retained for a minimum period of *6 years* following the date of termination of the relevant customer relationship and for a maximum period of *10 years* following that date;
 - (d) transaction data will be retained for a minimum period of *6 years* following the date of the transaction, and for a maximum period of *10 years* following that date;
 - (e) communication data will be retained for a minimum period of *6 years* following the date of the communication in question, and for a maximum period of *10 years* following that date;
 - (f) usage data will be retained for *6 years* following the date of collection;
- 5.5 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Security of personal data

- 6.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 6.2 We will store your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

- 6.3 The following personal data will be stored by us in encrypted form: your name, contact information, password(s) and cardholder data.
- 6.4 Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.
- 6.5 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 6.6 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

7. Your rights

- 7.1 In this Section 7, we have listed the rights that you have under data protection law.
- 7.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
 - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
 - (c) **the right to erasure** - you can ask us to erase your personal data;
 - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
 - (e) **the right to object to processing** - you can object to the processing of your personal data;
 - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
 - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
 - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>].
- 7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: [for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims].
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. In relation to complaints under EU data protection law, you may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement; in relation to complaints under UK data protection law, you should do so in the UK.
- 7.12 To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to G Howsam & Son Ltd.

8. Third party websites

8.1 Our website includes hyperlinks to, and details of, third party websites.

8.2 In general we have no control over, and are not responsible for, the privacy policies and practices of third parties.

9. Updating information

9.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

10. About cookies

10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

10.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies that we use

11.1 We use the following cookies and for the reasons explained below.

PHPSESSID:- To enable the site to recognise the same user clicking from page to page. Without it, every page would be treated as the first visit to the site, and anything added to the shopping basket would be instantly forgotten. Online shopping would, therefore, be impossible.

Session:- This is for the visitor's convenience, how website creates this with a copy of the initial session ID so that they can be classed as "returning" and the contents of their shopping basket will still be available. If the user signs in with an email address and password, these login details are also saved so that they can remain logged in when returning (the password is encrypted). If the user signs out, their login details are removed from the cookie.

12. Cookies used by our service providers

- 12.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 12.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 12.3 We publish Google AdSense advertisements on our website, together with advertisements advertisers and advertising networks that are distributed by Google. The advertisements may be personalised to reflect your interests. To help determine your interests Google and its partners use cookies. The cookies are used to track your previous visits to our website and your visits to other websites. You can opt out of Google's personalised advertising by visiting <https://www.google.com/settings/ads> and you can opt out of third party cookies use for personalised advertising by visiting <http://www.aboutads.info>. You can review Google's privacy policy at <https://policies.google.com/privacy>.
- 12.4 We use a Facebook pixel on our website. Using the pixel, Facebook collects information about the users and use of our website. The information is used to personalise Facebook advertisements and to analyse the use of our website. To find out more about the Facebook pixel and about Facebook's use of personal data generally, see the Facebook cookie policy at <https://www.facebook.com/policies/cookies/> and the Facebook privacy policy at <https://www.facebook.com/about/privacy>. The Facebook cookie policy includes information about controlling Facebook's use of cookies to show you advertisements. If you are a registered Facebook user, you can adjust how advertisements are targeted by following the instructions at <https://www.facebook.com/help/568137493302217>.
- 12.5 We use *Worldpay* as a payment service provider. This service uses cookies to collate general management data which is used to plan enhancement to your service. We never store any personal information in cookies (on any computer that you may use) that can be used to identify you, such as your name. You can view the privacy policy of this service provider at <https://online.worldpay.com/terms/privacy>

13. Managing cookies

- 13.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
 - (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
 - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
 - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

13.2 Blocking all cookies will have a negative impact upon the usability of many websites.

13.3 If you block cookies, you will not be able to use all the features on our website.

14. Cookie preferences

14.1 You can manage your preferences relating to the use of cookies on our website by visiting: www.howsamsmill.co.uk

15. Amendments

15.1 We may update this policy from time to time by publishing a new version on our website.

15.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

15.3 We may notify you of significant changes to this policy by email.

16. Our details

16.1 This website is owned and operated by *G Howsam & Son Ltd*

16.2 We are registered in England and Wales under registration number 08603261, and our registered office is at:- The Mill, Chapel Road, Old Leake, Boston, Lincs PE22 9PW

16.3 Our principal place of business is at The Mill, Chapel Road, Old Leake, Boston, Lincs PE22 9PW

16.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on [the contact number published on our website; or
- (d) by email, using the email address published on our website.

17. Data protection registration

17.1 We are registered as a data controller with the UK Information Commissioner's Office.

17.2 Our data protection registration number is *[number]*.

