

## Privacy policy for Liberty Wines Group

We are committed to safeguarding the privacy of our customers and suppliers, so this policy sets out how we will treat your personally identifiable information such as your name, email address, phone number and the company you work for, as well as personal bank details in some cases.

### 1) What personal information do we collect?

We hold your business-related personal data given to us when you set up an account, sign a contract, provide confirmation of your contact details by email, or if you have been in correspondence with our sales team about future business.

### 2) How we use your personal information

Personal information will be processed (this includes storage) for the purposes outlined below on the lawful bases stated below.

| Process  | Purpose   | Lawful basis   |
|--|---|--|
| Using your delivery address, email address and, in some cases, bank details  | To deliver your orders, send invoices and statements, collect payments and, in some cases, run credit checks  | Contract (fulfilling our contract of supply)   |
| Sending you necessary commercial communications by email [or post]   | To update you with necessary (non-marketing) trading information including changes to deliveries, holiday closures, price lists and vintage changes | Legitimate interests (it is in the interests of and necessary for our ongoing trading relationship)  |
| Sending you relevant updates by email [or post] such as invitations to tastings, press reviews, company newsletter and requests for feedback from time to time | To update you on matters relevant to our trading relationship.  | Legitimate interests (in the interests of furthering our trading relationship) (- unless you have provided prior consent, in which case, see below)        |
| Sending you relevant updates by email [or post] such as invitations to tastings, press reviews, company newsletter and requests for feedback from time to time | To update you on matters relevant to our trading relationship.  | Consent (certain customers have provided consent to receive these communications and data will continue to be processed for those customers on this basis) |
| Storing your personal data   | For the purpose of carrying out the processes outlined in this table  | Contract or Legitimate Interests (depending on relevant process above)   |
| Disclosing your personal data to a court or competent authority  | To comply with legal obligations  | Legal obligation   |
| Recording your image on CCTV if you visit our premises   | To ensure security of our premises  | Legitimate interests (necessary as part of securing our property from unwanted intruders)  |

# LIBERTY WINES

We will not provide your personal information to **any** third-party marketing company. However, in certain circumstance we will need to share your personal data with third parties, for example, we use an external mailing house for mailing hard copies of our price list. We believe this to be necessary and in the legitimate interests of our continued trading and we ensure that all such third parties comply with data protection legislation.

### 3) Website use

Most website browsers allow you to manage the use of cookies within the user preferences. If you wish to disable or delete cookies you should check the instructions on the Help pages of the browser you use. Disabling or deleting cookies may affect the content and functionality available to you on any website, including ours.

We use Google Analytics to analyse and understand how the site is being used so we can keep improving the user experience. All user data is anonymous. Google Analytics generates and stores statistical and other information about website use by means of cookies.

We do not collect personally identifiable information through visits to our website, but we do collect information about your computer and your visits to our website (including geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation). This information is used to improve the functionality and user experience of the website.

We do not collect your IP address to identify or track you.

Our website contains links to third party websites for whose privacy policies or practices we are not responsible.

### 4) Social Media

We use, or may use in the future, social media plugin functionality such as Facebook (Like and Share buttons). Their policy is listed here <http://www.facebook.com/about/privacy/>. We also use Twitter (Retweet and Tweet buttons). Their policy is listed here: <http://twitter.com/privacy>.

### 5) Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store any personal information you provide on our secure (password- and firewall-protected) servers. Any hard copies of personal data (for example contained in an account opening form or a contract) are stored securely and only accessible by relevant staff.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. When using the website, you are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to our website).

### 6) Policy amendments

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.



020 7720 5350  
order@libertywines.co.uk  
www.libertywines.co.uk  
@liberty\_wines

## 7) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to the supply of appropriate evidence of your identity, such as a passport and proof of address.

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes (by unsubscribing or emailing [gdpr@libertywines.co.uk](mailto:gdpr@libertywines.co.uk)) or to delete your personal information from our databases.

We will only hold your data for as long as necessary. If you have not traded with us for five years or more, we will delete your personal data from our system.

## 8) Updating information

Please let us know if the personal information we hold about you needs correcting or updating.

## 9) Data breach

We will report any serious, unlawful data breach to all relevant authorities within 72 hours of the breach, if it is apparent that personal data stored in an identifiable manner has been stolen or lost.

In the event of a major data breach, our Disaster Recovery or Crisis Management team will take whatever action is required to assess and resolve the situation.

## 10) Data Controller

The data controller of this website is: Liberty Wines Ltd, whose registered address is 6 Timbermill Way, London SW4 6LY. Our data protection registration number is ZA223617. If you would like to contact us regarding data protection, please email [gdpr@libertywines.co.uk](mailto:gdpr@libertywines.co.uk).