

# Our Privacy Policy

For cookies use – [click here](#)

We are committed to protecting and respecting your privacy.

## 1. This policy

1.1 **What this policy covers.** This policy (together with our [terms of use](#) and our [terms of sale](#) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us when you use our website, sign up to our newsletter or purchase products from us. Please read the policy carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website you are accepting and consenting (where applicable) to the practices described in this policy.

## 2. Information about us and how to contact us

2.1 **Who we are.** We are The Salcombe Brewery Co. Limited a company registered in England and Wales. Our company registration number is 08692080 and our registered office is at Estuary View, Ledstone, Kingsbridge, Devon, England, TQ7 4BL. For the purpose of data protection laws, we are a data "controller" and we are registered with the Information Commissioner's Office under number A8227266.

2.2 **How to contact us.** You can contact us by telephoning our customer service team at 01548 854888 or by writing to us at [contact@salcombebrewery.com](mailto:contact@salcombebrewery.com). Questions, comments and requests regarding this privacy policy are welcomed.

## 3. Why we process your personal data

We process your personal data for the following reasons:

3.1 **To provide products to you:** Where you order our products online (for example our beer and our brewery tours), we will process your personal data to provide these products to you (for example, by delivering goods to you or by providing the brewery tours at our premises). We may also process your personal data when providing you with information that you request from us. Our use of your personal data in this way includes sharing your personal data with our employees and other personnel, our payment gateway provider, and our courier service. We need to process your personal data in this way to be able to provide you with the products you have ordered from us or information you have requested from us. If you do not wish to provide us with your personal data in this way, you will be unable to purchase our products.

3.2 **To provide products to others:** Where you have provided personal data about another person (for example, where you order goods as a gift to be delivered to someone else or where you provide details of other people attending a brewery tour), we need to process such personal data in order to provide these products to the other person or people. As in section 3.1 above, this will include sharing their personal data with our employees and other personnel, and our courier service. We need to process their personal data in this way to be able to provide them with the products you have ordered from us. The legal basis on which we process their personal data in these circumstances is our legitimate interest to provide the person you have requested with the products you have ordered.

If you have booked a brewery tour, brew day or other service, you must also tell us if someone in your booking has any special requirements (such as access requirements or

allergies – see section 4.2 below)), and if they do you must provide us with their contact details. We have to obtain the special requirement details directly from the relevant person (not from you) as we rely on having their explicit consent to be able to process such details about them. Alternatively, you could ask them to contact us directly with their special requirements.

- 3.3 **To make our website better:** We may process your personal data in order to provide you with a more tailored website experience, such as allowing our shopping basket to remember what you have ordered from us. We may also tailor our website using your personal data to make sure it is displayed in the most effective way for the device you are using. We also use various third party cookies to help us improve our website (more details are set out in section 5), but we will not share your personal data with the third party analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will also process your personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis on which we process your personal data in these circumstances is our legitimate interest to provide you with a better user experience, and to ensure that our website is kept secure.

The use of any non-essential cookies is subject to your consent. You can also prevent us from using your personal data in this way by using the 'do not track' functionality in your internet browser. If you enable such functionality, our website may be less tailored to your needs and preferences.

- 3.4 **For marketing purposes:**

- (a) Where you have opted in to receive marketing communications from us (for example, if you have signed up to our newsletter), we will process your personal data to provide you with marketing communications in line with the preferences you have provided. We may use external marketing agents to help us with such marketing communications.
- (b) The legal basis on which we process your personal data for marketing purposes is your consent. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at 01548 854888 or [contact@salcombebrewery.com](mailto:contact@salcombebrewery.com) or, where relevant, by following the unsubscribe link in any marketing communication you receive from us. If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

- 3.5 **If our business is sold:** We will transfer your personal data to a third party:

- (a) in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or
- (b) if Salcombe Brewery or substantially all of its assets are acquired by a third party, in which case personal data held by Salcombe Brewery about its customers will be one of the assets transferred to the purchaser,

in each case, the legal basis on which we process your data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of your personal data in this way, the relevant seller or buyer of our business may not be able to provide products to you.

- 3.6 In certain circumstances we may also need to share your personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation.

#### 4. **What information we collect from you**

We collect and process the following personal data about you.

We combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out below (depending on the types of information we receive).

- 4.1 **Information you give us:** This is information about you that you give us by filling in your details at the online checkout process or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register for our newsletter, open an account with us, participate in social media functions on our website, enter a promotion or survey, and when you report a problem with our website. The information you give us may include names, addresses, email addresses, phone numbers and details for our brewery tours (see section 4.2 below).

- 4.2 **Sensitive data you give us:** We may require information about your health for our brewery tours or other similar services (for example, if you have any special access requirements for the tour, and if you have any allergies for any tasting). This is a special category of personal data which requires your explicit consent. We will only use such data in order to help ensure you get the most from the relevant service and will not use it for any other purpose. We will delete such data within 28 days after the tour or other service.

- 4.3 **Information we collect about you:** With regard to each of your visits to our website we will automatically collect the following information:

- (a) technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), 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.

- 4.4 **Information we receive from other sources:** We may receive information about you when you use our website. We work with third parties including business partners, sub-contractors, advertising networks, analytics providers, hosting providers and search information providers from whom we may also receive information about you.

#### 5. **Cookies**

- 5.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies.

5.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

5.3 Please see details of the Google Analytics cookies we use below:

Cookie name	Purpose	Expiration time	More information
_ga	Used to distinguish users	2 years	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gid	Used to distinguish users	24 hours	
_gat	Used to throttle request rate	1 minute	

5.4 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

5.5 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

## 6. Where we store personal data

6.1 The data that we collect from you will be stored in (and will not be transferred out of) the European Economic Area.

6.2 All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

6.3 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 website; 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.

## 7. Period of storage

7.1 Where you purchase products from us, we will retain your data for a period of 6 years after the goods were delivered or service performed, to ensure that we are able to assist you should you have any questions or feedback in relation to our goods or services.

7.2 Where we have processed your personal data to provide you with marketing communications with your consent, we may contact you at least every 12 months to

ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our lists.

## **8. Your rights under data protection laws**

### **Right to object**

#### **8.1 You have the right to object to us processing your personal data where we are processing your personal data:**

- (a) **Based on our legitimate interests (as set out at sections 3.3 and 3.5 above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and**
- (b) **for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.**

### **Right of access**

#### **8.2 You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing. We may charge you for exercising this right if we are allowed to do so by applicable law.**

### **Right to rectification**

You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

### **Right to restriction**

#### **8.3 You have the right to restrict our processing of your personal data where:**

- (a) the accuracy of the personal data is being contested by you;
- (b) the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
- (c) we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or
- (d) we are processing your data on the basis of our legitimate interest (as set out at sections 3.3 and 3.5 above) and you:
  - (i) object to our processing on the basis of our legitimate interest under section 8.1(a) above; and
  - (ii) want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

#### **8.4 Where any exercise by you of your right to restriction determines that our processing of**

particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

#### Right to data portability

- 8.5 You have the right to receive your personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

#### Right to erasure

- 8.6 You have the right to require us to erase your personal data which we are processing where one of the following grounds applies:

- (a) the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
- (b) our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;
- (c) you object to the processing in as set out in section 8.1(a) above and we have no overriding legitimate interest for our processing,
- (d) the personal data have been unlawfully processed; and
- (e) the erasure is required for compliance with a law to which we are subject.

- 8.7 You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

#### Exercising your rights

- 8.8 You can exercise such rights by contacting us at 01548 854888 or by writing to us at [contact@salcombebrewery.com](mailto:contact@salcombebrewery.com).

### **9. Links on our website**

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites please note that you have left our website and these websites should have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

### **10. Changes to our privacy policy**

Any changes we make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

This privacy policy was last updated on 16 November 2017.