

1 Introduction

Thomas Fattorini Limited is committed to protecting and respecting your privacy.

This policy (together with the terms and conditions of use of all websites owned by Thomas Fattorini Ltd (the “Website”)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Any changes to this privacy policy will be posted on the Website and will take effect immediately.

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Thomas Fattorini Limited, registered in England with company number 153351, whose registered office is at Skipton Castle, Skipton, North Yorkshire, BD23 1AQ.

2 Information that we collect from you

- 2.1 When you visit and/or register on certain areas of the Website you may be asked to provide relevant personal information about yourself including your name, contact details, and other relevant information.
- 2.2 We may also collect personal information (but not sensitive personal information) about your usage of the Website as well as information about you from messages you post to the Website and emails or letters you send to us.
- 2.3 We also monitor customer traffic patterns and website use, which enables us to further develop the Website to be useful to you.
- 2.4 We will not collect any personal information about you unless such personal information is relevant and where it is specifically and knowingly provided by you.
- 2.5 We will not collect any sensitive personal information about you unless such sensitive personal information is relevant and you have given explicit consent to the processing of such information.

3 Use of information

- 3.1 We will use and analyse the personal information we collect so that we can administer, support, improve and develop the Website and our business.
- 3.2 We may also use your data to provide you with information about goods and services which may be of interest to you and we may contact you about these by post, telephone or email. You may opt out of receiving this information at any time.
- 3.3 The GDPR requires the lawful basis of data processing to be defined. If this basis changes at anytime we will notify you with the new lawful basis which allows us to continue processing your data.
 - 3.3.1 The lawful basis of data processing under contractual agreement. This includes information provided by you which allows us to fulfil the obligations of a contract.
 - 3.3.2 The lawful basis of data processing under consent. Sometimes we may ask for your consent for marketing purposes, where you provide personal details. You may withdraw your consent from this service at anytime.
- 3.4 The data which you provide; some of which will be personal, will be used for the purpose of processing an order or enquiry.

4. Disclosure of your information

- 4.1 The information you provide to us will be held on our computers in the United Kingdom and accessed by or given to our staff working within the United Kingdom.
- 4.2 We may share aggregate information with our group companies and other parties within the United Kingdom. This is statistical data about our users’ browsing actions and patterns and does not identify any individuals. We

will not (save as set out in this policy) sell, transfer or share any personal information about you as an individual user of the Website outside our group of companies.

- 4.3 Where you have explicitly consented by way of “opt-in” when providing us with your personal details, we may also allow carefully selected third parties, including other companies in our group, to contact you occasionally about other goods and services which may be of interest to you. They may contact you by post, telephone or email. You may opt out of receiving this information at any time.
- 4.4 If our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.
- 4.5 We will co-operate with law enforcement agencies as well as related third parties to enforce laws such as fraud and other rights. You authorise us to disclose any information about you to such law enforcement or other government officials as we, in our sole discretion, believe necessary in connection with the investigation of fraud or other activity that is illegal or may expose us or you to legal liability. You further authorise us to process your information where the processing is necessary for the purpose of legal proceedings, obtaining legal advice, establishing or defending legal rights or for the administration of justice or the exercise of functions of a public nature.
- 4.6 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 the 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.

5 Cookies

- 5.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns and does not identify any individual.
- 5.2 Cookies are small amounts of information which we may from time to time store on your computer. Cookies make it easier for you to log on to and use the Website during future visits. They also allow us to monitor traffic and to personalise the content of the Website for you. You may set up your computer to reject cookies by changing your browser settings although, in that case, you may not be able to use certain features on the Website.

6 Security and data retention

- 6.1 In addition to these policies your personal data is protected in the UK by the General Data Protection Regulation. Under this Act we will only process any personal data we hold about you in a lawful and fair manner. We will keep your personal data secure to prevent access by unauthorised third parties and against unlawful processing, accidental loss, destruction and damage. Information provided will be stored on computer for a reasonable period, or for as long as the law requires, and may be used for analysis purposes as provided in this policy.
- 6.2 All information once processed and no longer required will be destroyed in a confidential manner.

7. Your rights

7.1 Access and Updating

You are entitled to see the information held about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us. We will take reasonable steps to verify your identity before amending or disclosing this information.

7.2 Erasure and Restriction of Processing

You are entitled to request removal or restriction of the information held on you. This can be requested both verbally and in a written format and we will take reasonable steps to verify your identity before completing such steps.

7.3 Withdraw Consent

You are entitled to withdraw your consent to marketing communications at anytime. This can be managed on your account.

8. EMAILS

- 8.1 If you are an existing customer, we will only contact you by email with information about goods and services similar to those which were the subject of a previous sale or enquiry to you. You may opt out of receiving this information at any time by following the instructions on the email.
- 8.2 We will not otherwise email you unless (a) you have specifically given your consent in response to “opt-in” boxes etc or (b) in response to your emails to us. We will not pass on your email address to any third parties unless you have specifically consented to this.

9. Job Application

If you send us information including a CV concerning a job application, we may keep this information on file for up to 3 months. Should an opportunity or relevant vacancy arise within that period we may contact you, after which the information will be destroyed in a confidential manner.

10. How can you complain?

- 10.1 If you are not satisfied by our policy or would like to complain you should contact us.
- 10.2 You have the right to complain to the ICO if you have any concerns with regard to the way your data is being handled.

11. CONTACT

All comments, queries and requests relating to our use of your information are welcomed and should be addressed to Webmaster, Thomas Fattorini Limited, Regent Street, Birmingham, B1 3HQ. sales@fattorni.co.uk