

# GDPR DATA PRIVACY NOTICE

This privacy notice is for users of all Ravens' Way's services including, without limitation, the supply of products and the Ravens' Way website <http://www.ravensway.uk> ("**services**", "**website**", "**site**"). It is also for suppliers of products and services to Ravens' Way. Ravens' Way's services and site are operated by Ravens' Way ("**company**", "**we**", "**us**", "**our**").

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you how we look after any personal data we collect from you or that you provide to us. We'll also tell you about your privacy rights and how the data protection law protects you. Please read it carefully to understand our views and practices regarding your personal information. It is meant to be read in conjunction with our other policies and terms and conditions. **Please note that this information is not a substitute for obtaining your own legal advice.**

## 1. Who we are and important information

### The purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your use of our services, including any data you may provide over the phone, by email or other electronic communication, by letter or through our website, including, without limitation, when you supply goods or services to us, purchase goods or services from us, sign up for our newsletter, take part in a competition, make a comment on a page or article, use a chat room or bulletin board, or review a product.

Our services are not intended for minors (children) and we do not knowingly collect data relating to them.

You must read this privacy notice together with any other privacy 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 privacy notice supplements the other notices and is not intended to override them.

### Data controller(s)

Ravens' Way is the controller of, and responsible for, your personal data and the Ravens' Way website. Our registered office and main trading address is Glyn Meibion Mawr, Y Groeslon, Caernarfon, LL54 7DP.

We have appointed a Data Protection Representative who is responsible for overseeing all data protection matters. For all data protection matters including questions on this document and requests to exercise your rights, please [contact our Data Protection Representative](#).

## Third-party links outside of our control

Our communications including our website may include links to third parties, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties or their services and are not responsible for their privacy statements.

When you use services from other suppliers we encourage you to read the privacy notice of every service you use.

## 2. The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

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

- **Identity Data** includes title, first name, last name, username or similar identifier, social media handle/s, date of birth, age
- **Contact Data** includes billing address, delivery address, email address, telephone number/s
- **Financial Data** includes your bank account number and sort code if we need to make payments or refunds to you. We do not collect debit or credit card details; all such payments to us are handled by a third party payment service provider (currently SumUp).
- **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, login details, browser type, version and plugins, time zone setting, location, operating system and platform, other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, enquiries, feedback and survey responses.
- **Usage Data** includes information about how you use our website, social media, products and services, and how these respond to your activities including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, mouse-overs, likes, shares etc), and methods used to browse away from the page.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, your communication preferences.

We may 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 privacy 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.

## If you fail to provide personal data

Where we need to collect your 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 with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. How we collect your personal data

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

- **Directly:** You may give us your identity, contact details and financial data by filling in forms or by corresponding with us by post, phone, email, messaging service, or otherwise. This includes, without limitation, personal data you provide to us when you:
  - Apply for our products or services, competitions or offers;
  - Create an account on our website or online billing system;
  - Subscribe to our services or publications;
  - Request marketing to be sent to you;
  - enter a competition, promotion or survey;
  - Post to interactive services such as website comments, feedback or product reviews.
- **Automated technologies or interactions:** As you interact with our services and systems, 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. Please see [our cookie policy](#) for further details.

- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below, including:
  - **Technical Data** from the following parties:
    - (a) **Analytics providers** such as Google, Facebook and Instagram based in the United Kingdom (UK), OR inside OR outside the European Union (EU); (b) **Search information providers** based in the UK, OR inside OR outside the EU.
  - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services based in the UK, OR inside OR outside the EU.
  - **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based in the UK, OR inside OR outside the EU.

## 4. How 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:

- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the 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 our Data Protection Representative](#).
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct or third party marketing communications to you via email or messaging service, post or telephone. You have the right to withdraw consent to marketing at any time by [contacting our Data Protection Representative](#).

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so, and our legitimate interests 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 our Data Protection Representative](#) 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:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Providing information to you to meet our regulatory obligations.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (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)
To enable you to take part in a prize draw, competition, offer or promotion.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

To administer and protect our business, services and 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 or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website and social media 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, social media, online services, 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, social media and other online services 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	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

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

We have established the following personal data control mechanisms:

### ***Promotional offers from us***

We may use your Identity, Contact, Technical, Usage, Profile and other data as specified in paragraph 2 above 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.

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us, or if you provided us with your details when you entered a competition or registered for a promotion, and, in each case, you have opted into and subsequently not opted out of receiving that marketing.

## ***Third-party marketing***

We will get your express opt-in consent before we share your personal data with any company outside Ravens' Way for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by logging into the website and checking or unchecking relevant boxes to adjust the marketing preferences **or** by [contacting our Data Protection Representative](#).

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, warranty registration, product or service experience or other transactions.

## **Cookies**

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see [our cookie policy](#).

## **Change of purpose**

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 our Data Protection Representative](#).

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.

## **5. Who we share your personal data with**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties:
  - **ICT providers and administrators** acting as processors OR joint controllers based in the United Kingdom OR inside OR outside the EU who provide IT, SaaS (software as a service), HaaS (hardware as a service), and internet, website, systems or communications services.

- **Professional advisers** acting as processors OR joint controllers including lawyers, bankers, auditors, accountants and insurers based in the United Kingdom 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.
- **Fraud prevention & credit reference agencies** to enable us to protect our rights, property, customer, or others.
- **Courier services** acting as processors OR joint controllers based in the United Kingdom OR inside OR outside the EU who provide delivery services.
- **Market research companies** when we ask you to complete surveys or provide other feedback on our services.
- **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 in this privacy notice.

We require all third parties (and their sub-processors/controllers, if any) 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.

Please [contact our Data Protection Representative](#) if you want further information on the specific mechanism used by us when transferring your personal data to the above parties.

## International transfers

Some of our external third parties are based outside the UK or European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the UK or EEA.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by implementing safeguards such as entering into a contract or similar agreement with us which obliges them to give your personal data similar protection to that which it has within the UK:

- **Xero accounting software** is certified as compliant with ISO/IEC 27001:2013 information security management system (ISMS). [See their security assurance information for more details.](#)



- **MailPoet marketing automation platform and email marketing service** state that they are GDPR compliant and have a data processing agreement and privacy notice. [See their GDPR Compliance page for more details.](#)

Please [contact our Data Protection Representative](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 6. Data security

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 staff, 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.

## 7. Data retention

We schedule regular reviews and deletions of retained data. 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances 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.

## 8. Your legal rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please [contact our Data Protection Representative](#).

## **No fee required – with some exceptions**

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may 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.

## **Time limit to 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.

## 9. Changes to this notice and your duty to inform us of changes

This policy was created on 2<sup>nd</sup> November 2019. It is reviewed annually, and as necessary. It was reviewed and updated on 14<sup>th</sup> September 2023. It is due to be reviewed in January 2024.

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

## 10. Queries, requests or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance [contact our Data Protection Representative](#).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 0303 1231113 or [via their email](#) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

Version 2.3.