

This Privacy Policy explains the types of personal data we may collect about you when you interact with us. This policy explains when and why we collect that data and how we keep it safe. This policy will be updated from time to time.

Asterley Bros, London has never, and will never, share or sell your details to third party companies for marketing purposes. You can opt out from email and postal marketing at any time. If you have any questions about anything covered in the policy, please let us know.

We collect your personal data when you:

- Sign up to receive newsletters from us.
- Sign up to our Beta Testing programme

The sort of personal data we collect:

- **Contact Data:** Your billing address, the delivery address, email address and telephone numbers.
- **Financial Data:** When ordering online your payment card details are securely stored with our third-party payment providers.
- **Transaction Data:** Your purchases from us including how often and what you buy from us.
- **Usage Data:** Details of your interactions with us and online including details of what you have viewed and added to your basket. Some of this information is collected by Google analytics and some using cookies.
- **Technical Data:** your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. Some of this information is collected by Google analytics.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.

The legal bases we rely on

Data Protection Law sets out a number of different reasons why we may collect and process your personal data including:

- **Consent:** In specific situations, we can collect and process your data with your consent, for example, when you tick a box to receive email newsletters.
- **Contractual obligations:** In specific situations, we need your personal data to comply with our contractual obligations, for example, if you order an item from us for home delivery, we will collect your address details to deliver your purchase and pass them to one of our couriers.
- **Legal compliance:** Sometimes the law requires us to collect and process your data, for example, we can pass on details of people involved in fraud to law enforcement.
- **Legitimate interest:** In specific situations, we need your personal data to pursue our legitimate interests in the usual way that would reasonably be expected as part of running a business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers. We will also analyse the purchases and shopping history of many of our customers to identify trends and make sure that we keep up with demand for new products. We will also use your address to send you marketing information by post, telling you about products that we think might interest you. If you no longer wish to hear from us, you can change your marketing preferences at any time.

How and why we use your personal data

We want to give you the best possible customer experience and to provide you with products you want. Most of the collection and processing we do of your personal data is for this purpose alone.

PURPOSE/ ACTIVITY	TYPE OF DATA	WHY WE USE YOUR DATA AND OUR LAWFUL BASES FOR PROCESSING
To register you as a new customer	Identity Data Contact Data	Performance of a contract with you You have requested to be a registered customer (consent)
To process your order on our website, in our shops or over the phone, to arrange delivery of your order (including managing payments) and to service our product guarantees.	Identity Data Contact Data Financial Data Transaction Data Marketing and Communications Data	Performance of a contract with you; Necessary for our legitimate interests (to recover money owed to us and to prevent fraud). Necessary to comply with a legal obligation.
To manage our relationship with you including responding to your queries, refund requests or complaints, notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey.	Identity Data Contact Data Profile Data Marketing and Communications Data	Performance of a contract with you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (to provide the best customer service and seek to improve it, to keep our records updated and to study how customers use our products/services).
To enable you to take part in a prize draw or competition.	Identity Data Contact Data Profile Data Marketing and Communications Data	Necessary for our legitimate interests (to study how customers use our products, to develop them and to grow our business). Consent (given at the time of entry into the competition)
To send you a survey or feedback request to help improve our products and customer services.	Identity Data Contact Data Profile Data Usage Data	Necessary for our legitimate interests (to study how customers use our products, to develop them and to grow our business). Consent (if you agree that we can use your feedback for marketing our products).

PURPOSE/ ACTIVITY	TYPE OF DATA	WHY WE USE YOUR DATA AND OUR LAWFUL BASES FOR PROCESSING
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Profile Data Usage Data	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to protect against fraud) Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	Necessary for our legitimate interests (to study how customer use our products/services, to develop test and improve them, to grow our business and to inform our marketing strategy)
To keep you informed by email, web, text or telephone about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on	Identity Data Contact Data Profile Data Transaction Data Usage Data Marketing and Communications Data	Consent (which you are free to opt out of at any time, see Your legal rights below) Necessary for our legitimate interests (to develop our products and grow our business)
To send you relevant, personalised communications by post in relation to updates, offers and products.	Transaction Data Technical Data Usage Data	Necessary for our legitimate business interests (in growing our business) Consent (which you are free to opt out of at any time, see Your legal rights below)
To use data analytics to improve our	Transaction Data Technical Data Usage Data	Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated

PURPOSE/ ACTIVITY	TYPE OF DATA	WHY WE USE YOUR DATA AND OUR LAWFUL BASES FOR PROCESSING
website, products, marketing, customer relationships and experiences		and relevant, to develop our business and to inform our marketing strategy).
To protect our customers, premises and assets from crime by using CCTV systems in our shops.	Identity Data	Legitimate business interests (to protect from crime).

How we protect your personal data

Our customers' data security is very important to us. We treat your data with the utmost care and take all appropriate steps to protect it. We have put in place appropriate security measures to prevent your personal data from being altered, disclosed, accidentally lost, used or accessed in an unauthorised way.

We secure access to all transactional areas of our website using 'https' technology.

Access to your personal data is password-protected and sensitive data (such as payment card information) is secured by encryption.

We also carry out regular tests, assessments and evaluations of the effectiveness of our system for possible vulnerabilities and attacks and conduct testing to find ways of increasing our data security.

In addition, we limit access to your personal data to those employees, 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 also 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.

How long we will keep your personal data

When we have collected and processed your personal data, we seek to keep it only for as long as is necessary for the purpose for which it was collected.

To determine the right retention period, we think about the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use, the purposes for which we process your data and whether we can achieve those purposes through other means.

Once it is no longer necessary to keep your data, we will either delete it or anonymise it. If we have used anonymisation, we may then put the anonymous data together with other data for statistical analysis for business purposes.

Your legal rights

You have the right to:

- Request access to or a copy of your personal data that we hold, free of charge in most cases.
- Request the correction of your personal data when incorrect, out of date or incomplete.
- Withdraw your consent (or to object) to us holding your data where we have no legitimate overriding interest or once the purpose for which we hold the data has come to an end (for example, the warranty period has ended).
- Ask that we stop using your personal data for direct marketing purposes.
- Request that your data be erased.
- Request the transfer of your personal data.
- Ask that we stop any consent-based processing of your personal data (for example where you opt-out of receiving email marketing from us).

You can change your marketing preferences, by following the 'unsubscribe' link at the base of all our email communications, by updating your marketing preferences in your Robert Welch account, emailing help@robertwelch.com or phoning 01386 840522. Any other requests should be emailed to help@robertwelch.com.

We will seek to respond to any request within 28 days. If you feel that your data hasn't been handled correctly or you are unhappy about our response to any requests you have made about the use of your personal data, please let us know. You also have the right to lodge a complaint with the Information Commissioner's Office.

Who do we share your personal data with?

We do share your personal data, where necessary, with trusted third parties, for example:

- IT companies including our website provider (Squarespace) and our email marketing company (Mailchimp). We also use an online CRM company to store some customer contact information (Zoho)
- Payment system companies (including Stripe and PayPal);
- Operational companies for example delivery couriers (DPD, DHL and Royal Mail);

In relation to all third parties:

- We provide only the information they need to perform their specific services for us.
- They may only use your data for the exact purposes we specify.
- We only engage third parties who have satisfied us that they respect your privacy and take all steps that they can to protect it at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data with law enforcement bodies. We may be required to disclose your data to the police or other government body on a proper request to do so.

In the case of any transfer of our business, your personal data would, where relevant, be transferred to new owners under the terms of this privacy policy.

Where your personal data may be processed

International Orders

On occasion we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), for example, in order to fulfil your order or maintain our systems. If we do this, we will have agreements in place to make sure your data receives the same protection as if it were being processed inside the EEA. For example, in relation to a delivery outside the EEA, our chosen couriers have robust data protection systems they adhere to in order to protect your personal data.