**PRIVACY AND COOKIE POLICY FOR TOMKERRIDGE.COM.**

We are The George Kirton limited. We’re a company registered in England and Wales . In this privacy notice we will refer to ourselves as ‘**we**’, ‘**us**’ or ‘**our**’.

You can get hold of us in any of the following ways:

### by phoning us on 01652 240270;

### by e-mailing us at enquiry@thegeorgekirton.co.uk; or

### by writing to us at

### The George

### 20 High Street

### Kirton in Lindsey

### Lincs

### DN21 4LX

The George Kirton Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

**Purpose of this Privacy Notice**

This Privacy Notice aims to give you information on how **The George Kirton Limited**collects and processes your Personal Data.

We will comply with the GDPR. This says that Personal Data we hold about you must be:

a) used lawfully, fairly and in a transparent way;

b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;

c) relevant to the purposes we have told you about and limited only to those purposes;

d) accurate and kept up to date;

e) kept only as long as necessary for the purposes we have told you about; and

f) kept securely.

It is important that you read this Privacy Notice so that you are fully aware of how and why we are using your data

**WHAT’S IN THIS POLICY?**

This policy tells you:

1. WHAT INFORMATION WE MIGHT COLLECT ABOUT YOU
2. HOW YOUR INFORMATION IS COLLECTED
3. HOW WE MIGHT USE YOUR PERSONAL INFORMATION
4. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA
5. WHEN DOES THE GEOTGE KIRTON LIMITED SHARE MY PERSONAL INFORMATION WITH OTHERS?
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?
9. YOUR LEGAL RIGHTS

This privacy notice gives you information on how The George Kirton collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter and mailing list.

It is important that you read this privacy notice together with any other privacy notice or fair processing 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**

The George Kirton Limited is the data controller and responsible for this website.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

**CONTACT DETAILS**

Our full details are:

Full name of legal entity: The George Kirton Limited

Company number: 11603320
Email address: enquiry@thegeorgekirton.co.uk
Postal address: The George, 20 High Street, Kirton in Lindsey, Lincs, DN21 4LX

You have the right to make a complaint at any time to the Information Commissioner. However, in the first instance we would like the ability to resolve the complaint directly, so please contact us at enquiry@thegeorgekirton.co.uk if you have any complaints.

**CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated in July 2023.

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

**THIRD PARTY LINKS**

This website may include links to third-party websites, 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-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Sometimes you can access our services from other places, like an article from another content provider. Make sure to check their privacy policy so you know how they will use your information.

**1. WHAT INFORMATION WE MIGHT COLLECT ABOUT YOU**

**1.1** Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

a) Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, and gender.

b) Contact Data includes email address, postcode and mobile number.

c) Profile Data includes your username and password, your interests, preferences, feedback and survey

d) Usage Data includes information about how you use our website, products and services.

e) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

f) Technical Data includes internet protocol (IP) address, 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 this website.

**1.2** We 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.

**1.3** Special Category of Personal Data are details about:

a) your race or ethnicity

b) religious or philosophical beliefs

c) sex life and sexual orientation,

d) political opinions,

e) trade union membership,

f) information about your health; and

g) genetic and biometric data.

**1.4** We do not normally collect any special categories of data nor do we collect any information about criminal convictions and offences other than for our employees or applicants for employment. However if we do need to processes any special categories of data then we will ask for your explicit consent to do so.

**2. HOW YOUR INFORMATION IS COLLECTED**

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

**2.1.1 Direct interactions**

You may give us your identity and contact Data and health data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

a) create an account on our website;

b) subscribe to our services or publications;

c) request marketing to be sent to you;

d) enter a competition, promotion or survey;

e) give us feedback or contact us; or

f) provide unsolicited information to us.

**2.2 Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

**2.3 Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as set out below:

**2.4 Technical Data**

from the following parties:

a) analytics providers such as Google based outside the EU;

b) advertising networks; and

c) search information providers.

**3. HOW WE MIGHT USE YOUR PERSONAL INFORMATION**

**3.1** 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:

**3.1.1** Where we need to perform the contract we are about to enter into or have entered into with you.

**3.1.2** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

**3.1.3** Where we need to comply with a legal or regulatory obligation.

**3.2** We may also use your Personal Data in the following situations, which are likely to be rare:

**3.2.1** Where we need to protect your interests (or someone else’s interests).

**3.2.2** Where it is needed in the public interest or for official purposes.

**3.3** Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending direct marketing communications to you via email or text message. **You have the right to withdraw consent to marketing at any time by contacting us.**

**4**. **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

**4.1** We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what your legitimate interests are where appropriate.

**4.2** Please 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 us if you need additional 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** | **Category of Personal 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 manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy; and(b) Asking you to leave a review or take a survey. | (a) Identity(b) Contact(c) Profile(d) Usage(e) 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 and clients use our products/services. |
| To enable you to partake in a prize draw, competition or complete a survey. | (a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications | (a) Performance of a contract with you and(b) Necessary for our legitimate interests to study how customers use our products/services; and to develop them and grow our business. |
| To administer and protect our business and our intranet and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity(b) Contact(c) Profile(d) Technical(e) Usage | (a) Necessary for our legitimate interests for running our business and employee relationship, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise and(b) 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 | (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, 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 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, to grow our business. |
| To verify your identity and to identify and prevent fraudulent transactions. |  (a) Identity(b) Contact(c) Profile | To verify your identity and to identify and prevent fraudulent transactions. |
| Where we have a legal right or duty to use or disclose your personal data (for example in relation to an investigation by a public authority or in a legal dispute). |                             (a) Identity(b) Contact(c) Profile(d) Technical(e) Usage | To comply with a legal or regulatory obligation. |
|  |  |  |  |

**4.3 Marketing:** we strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased products 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 expressly consented to receiving that marketing.

**4.4 Third-party marketing**: we will get your express opt-in consent before we share your personal data with any company outside the Tom Kerridge group of companies for marketing purposes.

**4.5 Opting out**: you can opt out at any time by updating your account, unsubscribing via an email or contacting us directly. This will not apply to personal data provided to us as a result of a product or service purchase experience or other transactions (which we will continue to process in order to perform a contract with you or as a result of our regulatory or legal obligations).**If you fail to provide Personal Data**where we need to collect 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 or employee benefits). 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.

**4.6** **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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy at the bottom of this page.

**4.7** **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 us.

**4.8** 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. WHEN DOES THE GEORGE KIRTON LIMITED SHARE MY PERSONAL INFORMATION WITH OTHERS?**

**5.1** When we use other companies to power our services. In order for us to give you quality experiences and to understand how you’re using our services we often use other companies to process your personal information on our behalf to analyse data on how people use our digital services so we can improve them.

**5.2** We will share your personal data with third parties as required by law or regulation.

**5.3** We require all third parties 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

**5.4** We may have to share your Personal Data with the parties set out below for the purposes set out in the table above at clause 4.

**5.5 Internal Third Parties:** other companies or departments in the COMPANY acting as processors or joint controllers and provide IT and system administration services and undertake leadership reporting

**5.6 External Third Parties**: service providers acting as processors based who provide IT and system administration services

**5.7 Other 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.

**5.8 Professional advisers**: acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting and payroll services.

**5.9 HM Revenue & Customs**, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

**5.10** We require all third parties 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.

**6. INTERNATIONAL TRANSFERS**

**6.1** We will not transfer your data outside the European Economic Area (EEA).

**7. DATA SECURITY**

**7.1** 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 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 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.

**8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

**8.1** We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

**8.2** 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.

**8.3** In some circumstances you can ask us to delete your data: see request deletion below for further information.

**8.4** 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.

**9. YOUR LEGAL RIGHTS**

**9.1** Under certain circumstances, you have rights under data protection laws in relation to your personal data. Further information about each of these rights is available below:

a)**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you free of charge. However we may charge a ‘reasonable fee’ if we think that your request is excessive, to help us cover the costs of locating the information you have requested. We will respond to your request as soon as possible and (save for in certain circumstances) within one month.

b)**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

c) **Request deletion**of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

d)**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e)**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

f)**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**g) Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**9.2** If you wish to exercise any of the rights set out above, please contact us.  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.

**9.3** **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.