

# Policy Privacy

## General

Cornberry.co.uk ("The Websites") are trading platforms of Cornberry Ltd ("The Company"), a registered company in England (no. 3573316) who's registered address is Osborne House, 143 – 145 Stanwell Road, Ashford, Middlesex TW15 3QN.

This policy, together with any other documents referred to on it, 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 this Privacy Policy carefully to understand our views and practices regarding your personal data and how we treat it. Once you use our Websites you will be regarded as having read and accepted its terms and this Privacy Policy. Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

We take your privacy and the security of your personal information very seriously. We never sell, distribute or supply your personal information to any other companies or individuals, unless such data is required to facilitate a request from you.

## The information we collect

We may collect and process personal information about you, which you give to us when you use our Websites or contact the Company. The type of personal information we collect will vary depending on the services you are requesting from The Company or the services you are using on our Websites:

- 1) details of your visits to our Websites including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access;
- 2) your email address if you register with us to receive our email newsletters;
- 3) your postal address if you request a quotation or place an order through our Websites or directly with The Company via post, fax, email or telephone;
- 4) more detailed personal information if you place an order for one of our services that requires additional delivery information, access information or security information in order for us to complete the service;
- 5) if you contact us, we may keep a record of that correspondence; and information that you provide by filling in forms on our Websites.

The provision of some of our services may also require us to store some personal information. We will periodically review your personal information to ensure that we do not keep it for longer than is necessary.

## Purposes for which we use your personal information

We may use your personal information:

- 1) to monitor and improve the performance of our Websites and services;
- 2) to provide you with emails and newsletters and special offers if you register with us;
- 3) to fulfil our obligations if you enter a prize draw or competition;
- 4) to process a transaction between you and a third party which you have requested;
- 5) to prevent fraud and defend our legal rights; and
- 6) as more fully detailed, overleaf.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## Improving our services

So that we can continually improve our Websites and services, we may use your data to perform statistical analysis to help understand how people are using our services. On occasions we may ask you for feedback on your experience of using the Websites. Unless otherwise stated, this information is only used internally and will not be published on the Websites.

## Cookies

A cookie is a small text file that is sent by the web server of the website you visit to your web browser and is stored on your computer. Cookies provide a number of functions in order to make websites work, or work more efficiently, as well as to provide information to the owners of websites (e.g. cookies can identify if you have previously visited a website).

For the purposes of The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, consent is managed by your browser settings regarding the use of and storage of cookies. We have implemented a pop-up warning on our Websites to alert you to cookies that we place. Most web browsers automatically accept cookies but you can alter your browser settings to prevent automatic acceptance or you can manually delete your cookie history whenever you wish.

To get instructions and guidance on managing and disabling cookies, please visit <http://www.allaboutcookies.org>. We use cookies set by Google, including Google Analytics on our website. You can view their privacy policy here: <http://www.google.com/policies/privacy/>

The information collected by cookies and other tracking methods is anonymous and does not contain any information that can personally identify you.

You may delete and block all cookies from our Websites but some parts of the Websites will not work. The social links, email forms and feeds used on our site may place a 3rd party cookie to work. Whilst the company does not govern the use of these cookies, nor have any control over the use of the information collected, we will monitor cookies used by 3rd party applications and, where necessary, remove the application all together from our websites. Any concerns regarding cookies in use on our site should be sent to: **The Data Controller, Cornberry Ltd, 2 Midhurst Road, Fernhurst, Surrey GU27 3EE.**

## Financial Data

We may collect financial data such as credit / debit card information via our websites. If you chose to make payment for goods or services using a credit / debit card, we will facilitate a transaction via PayPal but no personal information is recorded by The Company. PayPal are then deemed, by the Company, to be responsible for the security of your data once the transaction is processed.

## Informing you of special offers and services which may be of interest when you register with us

We would like to keep you updated, by e-mail or post, of other products and services which we feel you may benefit from or which you have specifically indicated that you have an interest in through our registration process.

We engage a third party email technology partner to help us coordinate and manage our email newsletters. They may process and store your personal information on our behalf in their systems subject to strict compliance with the Data Protection Act 1998. They will not contact you directly or share your personal information with any third parties.

We obtain additional personal information from third parties to enable us to improve the relevance of our communications to you.

You can easily unsubscribe from our emails at any time, either by clicking the “unsubscribe” link at the bottom of any electronic correspondence (may take up to 7 days to take effect); or by emailing us at newsletter@cornberry.co.uk.

## Testimonials, Case Studies, Prize Draws and Surveys

We may republish comments and testimonials sent to us by our users when they provide information by way of Case Study application forms and survey responses. These comments and testimonials may appear in articles and features on our Websites and other media. We will not disclose any user’s email address or any level of personal information that would enable any third party to contact or identify a particular individual (for example a full name and full area of residency). If you do not want us to republish any comments or testimonials then this should be clearly indicated and we will comply with your request.

## Disclosure of your Information

If you place an order through The Company or our Websites then we will collect your personal information and provide this only to that third party to facilitate the transaction you have requested. This data is collected and stored securely and is deleted from our records after the transaction has been processed by the third party provider.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- 1)** in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 2)** if The Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- 3)** if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of The Company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Security

All financial transactions are secured by SSL encryption to offer secure communications of sensitive data to and from the site, however, no data transmission over the Internet can be guaranteed to be totally secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Websites; 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.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Third party providers' and third party websites' personal information policies

We will not share your personal data with any third parties so that they might try to communicate with you except for the express purpose of fulfilling our obligations as detailed above.

If you decide to enter into a contract with a third party provider via our Websites then you are strongly advised to read that chosen provider's privacy policy. We cannot be held responsible for the uses to which a third party puts your personal information once you have contracted with that party.

We link to third party websites from our Websites. We cannot be held responsible for the uses to which any third party puts your personal information once you have left our Websites.

## Data processing and data control

The Company acts as both a data processor and a data controller within the meaning of the Data Protection Act 1998 with respect to handling your personal information.

The Company acts solely as a data processor where it facilitates orders for products and services placed through our Websites or The Company.

In the following instances, The Company acts as a data controller:

- 1) monitoring and improving the performance of our Websites and services;
- 2) providing you with emails and newsletters and special offers if you register with us;
- 3) fulfilling our obligations if you enter a prize draw or competition

## Your rights

You have certain rights under the Data Protection Act 1998 and you can contact us to ask whether we are keeping, processing or storing personal data about you, by writing to the Data Protection Officer at Cornberry Ltd, 2 Midhurst Road, Fernhurst, Surrey GU27 3EE.

If you ask us to delete, correct or amend your personal data we will do so within 7 working days of our receipt of the request.