



**CORNEY &  
BARROW**  
INDEPENDENT WINE MERCHANTS-1780

## **1. Privacy Notice**

Corney & Barrow Ltd (the "**Company**") is a member of the Corney and Barrow Group of companies (the "**Group**"). This Privacy Notice explains how we use any personal information we collect about you.

The Company is a data controller in respect of the personal data we collect about you for purposes of the General Data Protection Regulation (EU Regulation 2016/679) as it forms part of the laws of England and Wales and of Scotland ("**GDPR**") and the UK Data Protection Act 2018 ("**DPA**") and any other data protection legislation which supplements the GDPR and DPA in the United Kingdom in the future.

## **2. What information do we collect from you?**

Some of the information we collect is classified as "personal data" under the GDPR as it is information relating to an individual such as a sole trader, a partnership, a company director, a beneficial owner, a trustee, a professional contact etc.

We collect personal information which you provide when you complete an account application form or our online registration form, if you make an online purchase and check out as a guest or if you provide us with your personal details by email, telephone or any other means of communication. We may also collect personal information about you when you visit our website or social media channels.

The Company may collect and process the following types of personal data in connection with the services:

- ***Your name and sometimes your signature;***
- ***Your date of birth;***
- ***Your contact details such as your residential address, email and telephone number;***
- ***Your bank details and /or your card payment details;***
- ***Copies of documents you provide to prove your age or identity (including your passport and driver's license). This will include details of your facial image, and if your passport it will include your place of birth, gender and nationality;***
- ***Your image may be recorded on CCTV when you visit any of our offices or our shops;***
- ***Your IP address, location data, cookie & social identifiers (including for example gender and age range) and when you visit our website, the URL's of the webpages you have reviewed;***
- ***Your Social media username, if you interact with us through those channels to help us respond to your comments, questions or feedback;***

### 3. What information do we collect about you from third parties and public sources?

The Company may collect personal data about you from third parties or public sources. The personal data about you collected from such third parties and public sources includes the following information:

Type of Data	Collected from:
<ul style="list-style-type: none"> <li>Your name</li> <li>Your job title</li> <li>Your contact phone number</li> <li>Your email address</li> <li>Your relationship to a Corney &amp; Barrow account holder</li> </ul>	<p>Your name and contact details may be collected from an existing Corney &amp; Barrow account holder as an authorised contact.</p> <p>Your name and contact details may be collected from Companies House if you are a Director of a business we deal with.</p>
<ul style="list-style-type: none"> <li>Your residential address and address links to your name</li> <li>Fraud prevention information</li> <li>Public record information</li> <li>Possible matches to your name relating to PEP (Politically Exposed Persons) and Sanction checks</li> </ul>	<p>Before the Company approves payment terms, the Company will undertake credit and identity checks using an external credit reference agency and the Company will receive personal data relating to you in response to such a check.</p>

### 4. What is the purpose and legal basis for processing your information?

The purposes for which we may process all of the above personal data - and the legal basis on which we perform such processing - are:

Processing purpose	Legal basis for processing
Communicating with you in relation to products or services that we provide you	We have a <b>legitimate interest</b> in communicating with you in relation to the products or services that we provide you.
Communicating and interacting with you via our websites	We have a <b>legitimate interest</b> in communicating and interacting with you via our websites
Targeted marketing to increase sales where you have provided personal data in the course of a sale or negotiation for a sale, where the messages we send are only marketing similar products or services and where you gave consent to receive marketing, or you subscribed to our newsletter mailing list.	<p>We have a <b>legitimate interest</b> in promoting our business to specific individuals in order to increase sales.</p> <p>We have obtained your <b>consent</b> to contact you about wines, wine services and events</p>
Automated profiling and tracking of customers and potential customers. To build a picture of who you are and what our customers like which will also inform business decisions.	We have a <b>legitimate interest</b> in increased personalisation of your customer experience, being able to present you with more relevant information and offers

The placing of non-essential cookies on your devices to enable Corney & Barrow to provide you with a personalised user experience.	We have obtained your <b>consent</b> through a cookie banner and consent collection mechanism on the Corney & Barrow website. You can update your cookie preferences and give / withdraw your consent to placing non-essential cookies by visiting our <a href="#">Cookie Policy</a> .
Networking and promoting business growth	We have a <b>legitimate interest</b> in expanding our network of suppliers, customers and partners in order to expand our business
Establishing, exercising and defending our legal rights, such as debt enforcement via employment of a debt collector	We have a <b>legitimate interest</b> in establishing, exercising and defending our legal rights
For audit, compliance, controls and other risk management	We have a <b>legitimate interest</b> in establishing, exercising and defending our legal rights
For business management including manual data and record management	We have a <b>legitimate interest</b> in ensuring the accuracy of the data held and processed by the Company
Identifying issues with our existing services; planning improvements to existing services; and creating new services	We have a <b>legitimate interest</b> in identifying issues with our existing services; planning improvements to existing services; and creating new services
Processing your orders, managing your account, managing your wine in reserve, selling your wine and otherwise complying with our contractual obligations	It is necessary to process the personal data for the <b>performance of a contract</b> to which you are a party. It is necessary for you to provide the personal data in order for us to perform the contract and failure to provide such necessary personal data may preclude our ability to perform our obligations under the contract
Determining the risk of conducting business with you by running ID and / or credit search both at present and at any future date	We have a <b>legitimate interest</b> in legal and regulatory compliance.
Complying with our legal, regulatory and reporting requirements to regulatory bodies, such as HM Revenue & Customs	It is necessary to process the personal data in order to comply with our <b>legal obligations</b> . It is necessary for us to collect the personal data in order to use it for this purpose to comply with our statutory legal obligations and your failure to provide such necessary personal data may preclude our ability to continue our relationship with you.

You can object to the use of your personal data at any time, but this may restrict the services we can continue to offer you.

## 5. Who will you share my personal data with?

We may disclose your personal information to service providers who process data on our behalf in the course of providing services to the Company, including:

- Warehousing and delivery services who may contact you regarding the status of your delivery;
- Our customer relationship management service provider, direct marketing companies and mailing houses who help us manage our electronic and mailed communications;
- IT companies who support our website and other business systems;
- Banks and payment processors;
- Identification verification services to prevent or detect crime in compliance with current regulations;
- Data cleansing service providers to ensure your data is accurate;
- Third party debt collection agencies.

In some contexts, we may disclose the personal data to the following third parties:

- the Company's legal adviser for the purposes of providing legal advice to the Company;
- the Company's auditor for the purpose of providing audit services to the Company;
- HM Revenue & Customs and other regulatory bodies if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

We may also pass on your details to our wine producers & suppliers so they may invite you to events from time to time if you consent to this.

#### **6. Will we engage in automated decision-making and profiling?**

We do not make automatic decisions about you that will have a legal or similarly significant effect (within the meaning of Article 22 of the GDPR). However, if you interact with us online (or social media) we may collect data directly from you, in addition to your browsing and purchasing activity on-line, in a C&B shop or in direct communication with our staff at a Corney & Barrow office. This information will be combined with demographic data and data captured from third parties in order to improve your experience of dealing with our company, to tailor messages and recommendations to you and to help us improve our service.

#### **7. Will we transfer your personal data internationally?**

Your Personal Data may be transferred to, and stored in countries which have not yet been determined to offer adequate data protection according to UK data protection standards. This may be the case where your Personal Data is shared with our overseas branch in Singapore and our subsidiary in Hong Kong or other locations for legitimate purposes such as business administration.

The Company will also share personal data with service providers outside the UK in order to conduct our business and to provide you with the services you require. For example, marketing services providers who help us manage our electronic communication to our customers and logistics companies who deliver wine to you.

As and when transferring your Personal Data outside the UK is necessary, we will take legally required steps to ensure that appropriate safeguards are in place to protect your Personal Data and to make sure it is treated securely and in accordance with this notice. If you wish to obtain details of the safeguards which We have put in place to protect your Personal Data and privacy rights, please contact the Company at the address below.

## 8. How long will you retain and store my data for?

Personal data is stored for varying lengths of time depending on the nature and purpose for which it was collected.

To determine the appropriate retention period for your 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 and whether we can achieve the purpose of the processing through other means. Our retention of your personal data - and the criteria we apply to determine how long it is necessary for us to retain your personal data - is kept under review. In any case personal data will be retained for only as long as is necessary for the purpose for which it was collected subject to any statutory minimum periods. For further information about this, please contact us at [DPO@corneyandbarrow.com](mailto:DPO@corneyandbarrow.com).

## 9. What are my rights?

In certain circumstances, under the GDPR, you will have the right to:

- request access to your personal data;
- request rectification of your personal data if it is inaccurate or incomplete;
- restrict the processing of your personal data (for example, if you want the Company to establish its accuracy or the reason for processing it);
- object to your personal data being processed;
- lodge a complaint with a supervisory authority (e.g., the Information Commissioner's Office in the UK by contacting them at <https://ico.org.uk/concerns/> or by post at Wycliffe House, Water Lane, Wilmslow SK9 5AF);
- withdraw your consent to the processing, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Company have received notification that you have withdrawn your consent, they will no longer process your information for the purpose or purposes you originally agreed to, unless they have another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before it is withdrawal.

## 10. Contact Us

If you would like to contact us to access, rectify or request deletion of your personal data, object to the processing of your personal data, withdraw your consent to processing or make a complaint (if applicable), please contact the Company in writing by emailing us at [DPO@corneyandbarrow.com](mailto:DPO@corneyandbarrow.com) or to the following address:

Data Manager  
Corney & Barrow Ltd  
1 Thomas More Street  
London E1W 1YZ

## 11. Marketing and Communication

You can unsubscribe or amend your preferences on how we communicate with you at any time using the following methods:

Visit our website at [www.corneyandbarrow.com](http://www.corneyandbarrow.com) enter your username and password in the 'My Account Login' and access the Account / Communication Details' area to unsubscribe and / or change your preferences.

Email us directly at [unsubscribe@corneyandbarrow.com](mailto:unsubscribe@corneyandbarrow.com).

Phone us on + 44 (0)20 7265 2400

You can **also** unsubscribe from email communications by clicking the unsubscribe link at the foot of the email or alternatively you can change your preferences by clicking the update marketing preference link.

Please note that by unsubscribing from email communication, you will not receive any further marketing emails from Corney & Barrow, including the ones from your designated sales representative if you have one.

## **12. Updates to this Statement**

The Company reserves the right to update this Notice and any other relevant policies or procedures at any time. Any substantial changes that we may make to this Notice in the future will be provided to you by post or email depending on your preferred method of contact and posted on this page. The Company may also notify you in other ways from time to time about the processing of your personal data.