



Broad Windsor and District Community Enterprise Ltd

Privacy policy

16 November 2023

1. Introduction

1.1. We are committed to protecting your privacy and understand that when you give personal information to us you expect and trust us to take proper care with it. This Privacy Policy explains the data we store about you, how we use it, and your rights to see the data we hold about you. If you have any queries concerning the personal data we hold or our processing please contact us (using the contact details set out at the end of this Privacy Policy).

1.2. This Privacy Policy applies where we are acting as a data controller with respect to the personal data of our website visitors, suppliers members and service users; in other words, where we determine the purposes and means of the processing of that personal data.

2. Credit

2.1. This document was based on a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

3.1. In this Section 3 we have set out:

3.1.1. the general categories of personal data that we may process;

3.1.2. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;

3.1.3. the purposes for which we may process personal data; and

3.1.4. the legal basis of the processing.

3.2. We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location,

browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

- 3.3. We may process your account data ("**account data**"). The account data may include your name, address and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, and communicating with you. You can review and change your account data at any time.
- 3.4. We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, and employment details.
- 3.5. We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you.
- 3.6. We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include name, address, telephone number, email address, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers.
- 3.7. When you have opted in we may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters.
- 3.8. We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.9. We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.
- 3.10. In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

- 3.11. The legal basis for processing your personal data is our legitimate interests, namely the proper administration and management of our website, our services and our business.

4. Providing your personal data to others

- 4.1. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person
- 4.3. Except for where we have first obtained your express opt-in consent, we will not disclose your information to any third party for marketing purposes.

5. Retaining and deleting personal data

- 5.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, 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.
- 5.2. 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, regulatory, tax, accounting or other requirements.
- 5.3. In some circumstances you can ask us to delete your data: see 'Your Rights' section below for further information.

6. Your rights

- 6.1. You have the right to:

- 6.1.1. **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 and to check that we are lawfully processing it.

- 6.1.2. **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
- 6.1.3. **Request erasure** 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.
- 6.1.4. **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.
- 6.1.5. **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:
- 6.1.5.1. If you want us to establish the data's accuracy.
 - 6.1.5.2. Where our use of the data is unlawful but you do not want us to erase it.
 - 6.1.5.3. 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.
 - 6.1.5.4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 6.1.6. **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.

6.1.7. **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.

6.2. You may exercise any of your rights in relation to your personal data by written notice to us in accordance with Section 9.

7. Cookies

7.1. To use our website you will need to have cookies enabled on your web browser. We do not use or create cookies that can be used by themselves to identify you. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value.

7.2. The two types of cookies used on this website are:

7.2.1. Session cookies - temporary cookies that remain in the cookie file of your browser until you leave the site.

7.2.2. Persistent cookies - remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

7.3. Session cookies are used:

7.3.1. To allow you to carry information across pages of our website and avoid having to re-enter information; and

7.3.2. To allow you to maintain a shopping basket.

7.4. Persistent cookies are used:

7.4.1. To remember who you are so you do not have to login on a return visit;

7.4.2. To allow you to maintain a shopping basket if you are not logged in as a registered user; and

7.4.3. By Google Analytics, a third party service provider (we use Google Analytics to collect information about how visitors use our website. The

cookies they set do not collect information that identifies the visitor. All information collected is aggregated and therefore anonymous. We use this information to improve our website and your shopping experience).

7.5. By using our website, you agree to us placing cookies on your computer or device. You can find out more about cookies by visiting http://en.wikipedia.org/wiki/HTTP_cookie.

8. Amendments

8.1. We may update this policy from time to time by publishing a new version on our website.

9. Our details

9.1. This website is owned and operated by **Broadwindsor and District Community Enterprise Ltd.**

9.2. We are a registered society (formerly an Industrial and Provident Society) registered in England with the Financial Services Authority under No 31629R whose registered office is at The Old Telephone Exchange, Drimpton Road, Broadwindsor, Dorset DT8 3QL.

9.3. Our principal place of business is at Old Telephone Exchange, Drimpton Road, Broadwindsor, DT8 3QD

9.4. You can contact us:

(a) by post, to the following address:

BADCE Ltd
The Old Telephone Exchange
Drimpton Road
Broadwindsor
Beaminster
Dorset
DT8 3QL

(b) by telephone, on the contact number published on our website.

www.broadwindsorcommunitystores.org.uk