

General Data Protection Regulation (GDPR) Privacy policy:

Bluestone Vineyards ("we", "our", "us" or "BSV") is committed to protecting the privacy of all users of our website www.bluestonevineyards.co.uk. Please read the following privacy policy that explains how we use and protect your information. We are the "data controller" of the information you provide to us.

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1. CONTACT DETAILS

If you have any queries or requests concerning this privacy policy or how we handle your data more generally, please get in touch with us using the following details.

- By contacting our general customer services team at:
nmccconnell@bluestonevineyards.co.uk
- By contacting our Data Protection Officer:
nmccconnell@bluestonevineyards.co.uk

2. HOW WE COLLECT YOUR INFORMATION

We collect your personal information when you interact with us or use our services, such as when you use our site to book tickets online. We also look at how visitors use our site, to help us improve our services and optimise customer experience.

We collect information:

- when you subscribe to our newsletter via our website
- when you purchase physical product via our website
- when you purchase tickets to visit us via our website
- when you contact us directly via email, phone or post

- when you browse and use our site

3. INFORMATION THAT WE COLLECT FROM YOU

As part of our commitment to the privacy of our customers and visitors to our site more generally, we want to be clear about the sorts of information we will collect from you.

When you visit the site or make an order through the site, you are asked to provide information about yourself including your name, email, contact details, billing address, order details and payment information such as credit or debit card information.

We also collect information about your usage of the site and information about you from any messages you post to the site or when you contact us or provide us with feedback, including via e-mail, letter, phone or chat function.

4. USE OF YOUR INFORMATION

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information: if we need to process your information in order to provide you with the service you have requested or to enter into a contract; we have your consent; we have a justifiable reason for processing your data; or we are under a legal obligation to do so.

Where we need to in order to provide you with the service you have requested or to enter into a contract, we use your information:

- to enable us to provide you with access to the relevant parts of the site
- to supply the services you have requested
- to enable us to collect payment from you
- to contact you where necessary concerning our services, such as to resolve issues you may have with your order

We also process your data where we have a justifiable reason for doing so— for example personalisation of our service, including processing data to make it easier and faster for you to make purchases. We have listed these reasons below:

- to improve the effectiveness and quality of service that our customers can expect from us in the future
- to enable our customer support team to help you with any enquiries or complaints in the most efficient way possible
- to contact you for your views and feedback on our services and to notify you if there are any important changes or developments to the site or our services, including letting you know that our services are operating in a new area, where you have asked us to do so
- to analyse your activity on the site so that we can administer, support, improve and develop our business and for statistical and analytical purposes and to help us to prevent fraud
- to enforce our contractual terms with you and any other agreement, and for the exercise or defence of legal claims and to protect the rights of BSV (including to prevent fraud)
- if you submit comments and feedback regarding the Sites and the services, we may use such comments and feedback on the Sites and in any marketing or advertising materials. We will only identify you for this purpose by your first name and the city in which you live

Where we are under a legal obligation to do so we may use your information to:

- create a record of your order(s)
- comply with any legal obligation or regulatory requirement to which we are subject

5. DIRECT MARKETING

Where you have given your consent or where we have a justifiable reason for doing so (and are permitted to do so by law) we will use your information to let you know about our other products and services that may be of interest to you and we may contact you to do so by email or phone. You can control your email marketing preferences by clicking “unsubscribe” from any of our newsletter emails.

6. RETENTION OF YOUR INFORMATION

We will not retain your information for any longer than we think is necessary.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved
- legal obligation(s) under applicable law to retain data for a certain period of time
- guidelines issued by relevant data protection authorities

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

7. DISCLOSURE OF YOUR INFORMATION

The information we collect about you will be transferred to and stored on our servers located within our registered office. We are very careful and transparent about who else your information is shared with.

Sharing your information internally

- We share your information with other CRBF group companies only where necessary

Sharing your information with third parties

We share your information with third party service providers. The types of third party service providers whom we share your information with includes:

- **Payment providers (including online payment providers and fraud detection providers):** for the purposes of providing services to us, for example when they process information such as credit card payments for us, provide support services to you or carry out fraud checks for us
- **IT service providers (including cloud providers):** for the purposes of data storage and analysis
- **Customer support partners:** who will help us to resolve any issues you may have with our services
- **Marketing and advertising partners:** so that they can ensure that you see advertising which is more relevant to you and send you email marketing on our behalf.

BSV will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy when it is transferred to third parties.

If our business enters into a joint venture with, purchases or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, our new business partners or owners or their advisors.

We may also share your information:

- if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation or regulatory requirement. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention
- in order to enforce our contractual terms with you and any other agreement
- to protect the rights of BSV or others, including to prevent fraud
- and with such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police.

International transfers of data

- In some cases the personal data we collect from you might be processed outside the European Economic Area ("EEA"), such as the United States, the Philippines and the countries in which BSV operates. These countries may not have the same protections for your personal data as the EEA has. However, we are obliged to ensure that the personal data that is processed by us and our suppliers outside of the EEA is protected in the same ways as it would be if it was processed within the EEA. There are therefore certain safeguards in place when your data is processed outside of the EEA.

We ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- your personal data is transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- we use the EU approved Standard Contractual Clauses
- where your personal data is transferred to third party providers based in the US, data may be transferred to them if they have self-certified under the Privacy Shield framework in relation to the type of data

being transferred, which requires them to provide similar protection to personal data shared between the EU and the US.

Please contact us on nmccconnell@bluestonevineyards.co.uk if you want further information on the countries to which personal data may be transferred and the specific mechanism used by us when transferring your personal data out of the EEA.

8. SECURITY

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Where you have chosen a password that allows you to access certain parts of the Sites, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Sites; 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.

9. YOUR RIGHTS

Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details set out above. For additional information on your rights please contact your data protection authority and see below.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this policy.

The right of access. You have the right to obtain access to your information (if we're processing it). This will enable you, for example, to check that we're using your information in accordance with data protection law. If you wish to access the information we hold about you in this way, please get in touch.

The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us.

The right to erasure. This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you by contacting us.

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority.

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can do this by contacting us. Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.

10. CHANGES TO OUR PRIVACY POLICY

Any changes to our privacy policy will be posted to our website and, where appropriate, we will notify you of the changes for example by email.

This privacy policy was last updated: 24/04/2019

11. COMPLAINTS

Complaints can be made at any of the following:

In writing - Bluestone Vineyards, Cholderton Rare Breeds Farm, Amesbury Road,
Cholderton, Wiltshire, SP4 0EW

By telephone - (01980) 629438

By email - nmccconnell@bluestonevineyards.co.uk