#### **PRIVACY POLICY**

This notice aims to give you information as to how we collect and process your personal data through your dealings with us and/or your use of our website, <u>www.shepherd-distribution.co.uk.</u>

Yarborough Limited t/a Shepherd Distribution Services (**we, us** or **our**) is a company registered in England and Wales (CRN 0660908) with its registered office at Birley Vale Avenue, Sheffield, S12 2AX and as the data controller we are responsible for your personal data.

We are committed to protecting your personal data and processing it in compliance with applicable data protection laws. If you have any questions regarding your personal data or this notice please contact us (see details below).

## WHAT DATA DO WE COLLECT ABOUT YOU

The kinds of personal data that we may collect and process about you is varied and, for ease, we have grouped it together as follows:

- Identity Data: first name, surname, and title.
- Contact Data: billing address, delivery address, email address and telephone numbers.
- Financial Data: bank account and payment card details.
- Transaction Data: details about payments to and from you and about the goods and/or services you have purchased from us.
- Technical Data: internet protocol (IP) address, your customer login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform used by the devices you use to access our website.
- Usage Data: information about how you use our website and our goods and/or services.
- Marketing and Communications Data: your preferences in receiving marketing information from us and/or our third parties and your communication preferences.

#### HOW DO WE COLLECT YOUR PERSONAL DATA

Through your dealings with us, we may collect personal data about you and you may provide personal data to us. The different methods we use include the following:

- Direct interactions. You may give us your personal data by corresponding with us by post, phone, email, by filling in a form on our website or otherwise. This includes personal data that you provide when you:
- enquire about and/or purchase our goods and/or services;
- create an account with us;
- create a user profile on the customer area of our website;
- subscribe to our newsletters, updates or other publications;
- request marketing information be sent to you;
- give us feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We will 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.
- Third parties or publicly available sources. For example, search information providers, analytics providers, Companies House or the electoral register. If you require any more information about this, please contact us.

#### HOW DO WE USE YOUR PERSONAL DATA

We have set out in the table below a description of the ways we plan to use your personal data, and the legal bases we rely on to do so.

We do not generally rely on consent as a legal basis for processing your personal data, other than in relation to sending third party direct marketing communications to you via email or text message.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity	Performance of a contract with
	(b) Contact	you
To process and deliver your contract including:	(a) Identity	(a) Performance of a contract with
(a) Manage payments, fees and charges	(b) Contact	you
(b) Collect and recover money owed to us	(c) Financial	(b) Necessary for our legitimate

	(d) Transaction	interests (to recover debts due to
	(e)Marketing and Communications	us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Sending you marketing information	(a) Identity (b) Contact (c) Profile (d)Marketing and Communications	<ul> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	products/services)(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (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	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e)Marketing and Communications</li> <li>(f) Technical</li> </ul>	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	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)

#### Marketing

We strive to provide you with choices regarding the use of your personal data for marketing and advertising purposes.

# Promotional offers from us

We may use your personal data to form a view on what goods and/or services we think you may want or need, or what may be of interest to you but you will only receive marketing communications from us if you have requested information from us or have purchased goods and/or services from us and, in each case, you have not opted out of receiving that marketing.

#### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party company for marketing purposes.

#### Opting out

You can ask us or any third parties to stop sending you marketing information or messages at any time by contacting us. Our contact details are set out at the end of this notice.

#### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. We use Google Analytics to help us understand how users interact with our website content. If you do disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

#### DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to fulfil the purposes set out in the table above, for example, to:

- Service providers such as Palletline who provide a delivery network service
- Service providers who provide IT and system administration services

- Professional advisers; and
- When we are legally required to do so by a court, governmental, regulatory or other body.

We may also disclose your personal data to a third party if we choose to sell, transfer, or merge parts of our business or our assets. If such a change happens to our business, the new owners may use your personal data in the same way as set out in this notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with applicable data protection laws. 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.

We do not disclose or transfer your personal data outside the European Economic Area.

## DATA SECURITY

We have put in place appropriate security measures to keep your personal data safe and to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal data to those employees, agents, contractors and other third parties on a 'business need to know' basis. Your personal data will only be processed on our instructions and by those persons who are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected or actual personal data breach.

## DATA RETENTION

We only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

## THIRD PARTY LINKS

Our website may include links to third-party websites. We do not control these third-party websites and are not responsible for their privacy statements. Please ensure you read the privacy notices of those websites.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have the right to:

- Request of copy of the personal data we hold about you.
- Request the correction or erasure of your personal data.
- Object to, or request a restriction to, the processing of your personal data.
- Request a transfer of your personal data, to you or to a third party.
- Withdraw your consent, at any time, where we are relying on your consent to process your personal data.

If you wish to exercise any of these rights, please contact us. Please note that before dealing with your request, we may need to ask you to provide additional information so that we can confirm your identity.

#### CONTACT US

If you have any questions about this notice or any concerns over our use of your personal data please contact us in one of the following ways:

Privacy manager(s): Laurence Abel / Ian Davis / John Parker

Email address: traffic@shepherd-distribution.co.uk

Postal address: Yarborough Limited t/a Shepherd Distribution Services, Birley Vale Avenue, Sheffield, South Yorkshire, England S12 2AX

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Telephone number: 0114 253 1355

You have the right to make a complaint at any time to the UK Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with any complaint or concerns before you approach the ICO, so please do contact us in the first instance.

Last Updated: Sept 2020 (no new amends)