

## Privacy Policy

embh Limited knows that you care how information about you is used and shared, we appreciate your trust in us to do that carefully and sensibly. This notice describes embh's policy; please read this to understand what we do with your information.

**By visiting embh-ltd.com or accessing and using our services, you are accepting and consenting to the practices described in this Privacy Notice.**

### Purpose of this privacy notice

This privacy notice aims to give you information on how embh Limited and the companies within the organisation collect and processes your personal data.

### The data we collect about you

All personal information we collect about you will be recorded, used and protected by us in accordance with applicable data protection legislation and this privacy policy. We may supplement the information that you provide with other information that we obtain from our dealings with you.

The types of data we collect about you includes

**Identity data;** includes first name, last name, user name or similar identifier.

**Contact data;** includes billing address, delivery address, email address and telephone numbers.

**Profile data;** includes your user name and password, purchases or orders made by you.

### We do not collect sensitive personal data

Where we need to collect personal data by law, or under the terms of a sales order and you fail to provide that data when requested, we may not be able to complete the sales order.

### How your data is collected

We use different methods to collect data from and about you including;

Direct Interactions: You may give us your data by filling in forms, interaction with a member of our sales team, using our website, corresponding by post, phone or email

We operate a number of CCTV cameras around our premises, these operate 24 hours a day and all areas of our premises are monitored.

### How we use your personal data

We use your personal data in a number of ways for the purpose of;

- Order fulfilment
- Shipping
- Fraud prevention
- Marketing purposes
- Legal duties
- Disputes

EMBH Limited is the parent company of these companies:

## **Marketing**

We occasionally send our information on new products, promotions, special offers and similar materials. We don't agree in sending out dozens, just those which we deem may be relevant or of interest to you. We hope you will agree to receive these. To do so you will need to give us your consent, you may do so by emailing us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com). Please title your email 'OPT IN'

## **Opting Out**

If you have previously given consent to receive emails and change your mind you can ask us or third parties to stop sending you marketing messages at any time by emailing us as [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com). Please title your email 'OPT OUT'.

## **Third-party marketing**

Should we ever use a third-party for marketing, we will obtain your express opt-in consent before we share your personal data with any outside the embh Limited group of companies.

## **Change of purpose**

We will only use your personal data for the purposes of which we collected it, unless we reasonably consider that we need to use it for another reason and reason is compatible with the original purpose. We will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

## **Disclosure of your personal data**

Information about our customers is an important part of our business and we do not sell it to others. We will only share it for the purposes set out below.

**Affiliated business we control:** As part of a group of companies we share data with our other companies to be used for similar purposes.

**Affiliated business we do not control:** We currently do not have any relationships with any businesses where we would need to share your personal data. Should we use an outside company for our promotions and marketing, we will gain you express consent to share your information before any information is transferred to a third party.

**Third party service providers:** We employ the services to carry out tasks such as deliveries. They have access to very basic data which is limited to your name and your address, no other information is shared with them. Without sharing this basic information, we will be unable to deliver orders placed with us.

**With your consent:** other than set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share this information.

## **Data Security**

We may monitor or record telephone calls for security purposes and to improve the quality of services that we provide you.

Please note that for your security and safety, CCTV is in operation on our premises.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

You have the right to ask embh Limited to provide you with all of the information it stores on you. If you wish to access your personal data, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email 'INFORMATION REQUEST'

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another party or if embh Limited is legally prevented from disclosing such information. In addition, embh Limited may be able to

retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

#### **Data retention**

We will 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.

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 requirements.

In certain circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### **Your Legal rights**

**Request to 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 check that we are lawfully processing it. If you wish to access your personal data, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email ‘INFORMATION REQUEST’

**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. If you wish to correct your personal data, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email ‘CORRECTION REQUEST’

**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 or erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. If you wish to Erase your personal data, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email ‘ERASURE REQUEST’

**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 overrides your rights and freedoms. If you wish to object, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email ‘OBJECTION’

**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: (a) if you want us to establish the data’s accuracy (b) where our use is unlawful but you do not want us to delete it (c) where you request us to keep the data even if we no longer require it as you require it to establish, exercise or defend legal claims (d) you have objected to our use of your data but need to establish that we have overriding legitimate grounds to continue to use it. If you wish to request a restriction, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email ‘RESTRICTION REQUEST’

**Request the transfer of processing** 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 sale with you.

**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 your time you withdraw your consent. If you wish to withdraw your consent, please contact us at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com) or with any other aforementioned rights. Please title your email 'WITHDRAW CONSENT'

If you wish to exercise any of the rights set out above, please contact the privacy manager at [dataprivacy@embh-ltd.com](mailto:dataprivacy@embh-ltd.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and to ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Ends.  
15<sup>th</sup> May 2018.