**PRIVACY POLICY**

This privacy policy sets out how Coddy’s Collection uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. Important information and who we are

**Privacy policy**

This privacy policy gives you information about how we collect and use your personal data through your use of this website, including any data you may provide when you register with us or sign up to our newsletter or purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

1. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* Identity Data includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
* Contact Data includes billing address, delivery address, email address and telephone numbers.
* Financial Data includes bank account and payment card details.
* Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
* Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
* Profile Dataincludes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
* Usage Data includes information about how you interact with and use our website, products and services.
* Marketing and Communications Dataincludes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

1. How is your personal data collected?

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

* **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
* apply for our products or services;
* create an account on our website;
* subscribe to our service or publications;
* request marketing to be sent to you;
* enter a competition, promotion or survey; or
* give us feedback or contact us.
* **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We 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. Please see our cookie policy [Cookie Policy.docx](Cookie%20Policy.docx) for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties.

1. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

* **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
* **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
* **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
* **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

|  |  |  |
| --- | --- | --- |
| **Purpose/Use** | **Type of data** | **Legal basis** |
| To register you as a new customer | (a) Identity (b) Contact | Performance of our contract with you to purchase goods from us |
| To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of our contract with you to purchase goods from us(b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Dealing with your requests, complaints and queries | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of our contract with you to purchase goods from us(b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of our contract with you to purchase goods from us(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| 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 | (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 online advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical  | 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, customer relationships and experiences and to measure the effectiveness of our communications and marketing | (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 send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications | Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) **and/or**Consent, having obtained your prior consent to receiving direct marketing communications |
| To carry out market research through your voluntary participation in surveys |  | Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services). |

Direct marketing

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

1. Disclosures of your personal data

We may share your personal data with the following parties, where necessary, for the purposes described in this policy:

* Internal Partners:
* External Partners:
* Specific Third Parties: Identified in the relevant section or as applicable to specific purposes.

All third parties must handle your data securely and in compliance with the law. They are only permitted to process your data for specified purposes according to our instructions.

1. International transfers

We do not transfer your personal data outside the UK.

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

1. Data retention

How long will you use my personal data for?

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.

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.

1. Your legal rights

Under data protection laws, you have the following rights regarding your personal data:

* Access: Request a copy of your personal data and check its lawful processing.
* Correction: Request correction of incomplete or inaccurate data. We may verify the new data's accuracy.
* Erasure: Request deletion of your data in certain circumstances (e.g., unlawful processing). We may decline for specific legal reasons, which we’ll explain if applicable.
* Objection: Object to processing based on legitimate interests or profiling and opt out of direct marketing anytime.
* Data Transfer: Request your data in a structured, machine-readable format to you or a third party (applies to automated data).
* Consent Withdrawal: Withdraw consent where applicable, without affecting prior lawful processing. This may impact certain services.
* Restriction: Request suspension of data processing if:
	+ Accuracy is disputed;
	+ Processing is unlawful, but you oppose erasure;
	+ Data is needed for legal claims; or
	+ You object, and we verify overriding grounds.

To exercise these rights, contact us (see below).

No fee usually required

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 could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and 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 you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

1. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

* Email address: luke@coddyscollection.com
1. Complaints

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

1. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.