

# Privacy Policy

At Three Bears Cookery Club, we know that privacy and security is a major concern. We have set out the procedures we use for safeguarding your personal data. Please read this Privacy Policy carefully and check it occasionally as it could change from time to time. This privacy policy adheres to the guidance set out by The EU General Data Protection Regulation (GDPR)

## Three Bears Cookery Club's Privacy Promise

Three Bears Cookery Club are dedicated to safeguarding your privacy online. We will only collect, store and use your personal information for specific purposes as outlined below in accordance with GDPR. We use your personal information to support and develop our connection with you. We will never share your personal data to 3<sup>rd</sup> parties unless required by law and your data is always protected. You may contact Three Bears Cookery Club at any time with any privacy queries or concerns and to see the personal data you have given us and request modification.

Personal data means any information relating to an identified or identifiable natural person. This can include name, email address, address, and much more.

## Your information

When you register on our website to purchase products or sign up for our services, we ask for data such as your name, e-mail address, billing address, and contact details. Three Bears Cookery Club keeps a record of this information for tax purposes and for ensuring we fulfil our contract with you.

For customers registering for our cookery classes, Three Bears Cookery Club provides a form to fill in which contains some personal data including medical conditions and allergies. This form is provided for safeguarding reasons.

We share it with nobody, however it is stored on relevant systems such as cloud systems, Google Drive, social media, and accounting systems which are GDPR compliant. If we are required by law to share any information, we will check with each party concerned to ensure they are happy for that to happen. An example of this would be if HMRC requested an audit.

We store sensitive data for as long as customers remain active clients and for 6 months following. This including registration forms. Email addresses provided via Wix subscriber platform are stored until consent is withdrawn, re-consent is requested every 2 years. Information required for tax and legal requirements are held for 7 years as a requirement by law.

We keep a record of any services you have from us, so we can help to deal with any enquiries or problems you may have in the future, and so we can ensure that any information that we send to you is appropriate. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

When you attend a Three Bears Cookery Club class you will be asked whether you'd like to consent to us displaying your order as part of our marketing materials. By giving your consent for us to do this you understand your personal data will be in the public domain and we assume no responsibility for the usage of this data subsequently. You may request to have your personal data removed at any time and we are more than happy to comply within 7 working days.

We keep a record of any e-mail communication you send us for 1 year, so we can track any problems or concerns you've had.

In addition to personal information, our website uses Google Analytics to ensure we are meeting your customer needs. Google Analytics stores usage data which may include your IP address, geographical location, referral source, length of visit and page views – although a lot of this is aggregated data. The legal basis for this is legitimate interest for the basis of ensuring we are meeting customer needs.

We may process information you submit to us when you contact us for the purposes of ensuring we answer your query effectively.

Three Bears Cookery Club kindly request that you do not supply any other person's personal data to us, unless required by law, you are a parent or guardian or you have their explicit consent to do so.

## **How we use your personal data**

All the data we gather via our website or through communication with you is used to operate and expand the service we offer you and to personalise our service. How we use your personal data is dependent on the legal basis for processing your data. We are dedicated to using your personal data only for:

1. Processing your orders correctly.
2. Development and expansion of the business, including examination of customers' shopping behaviours, measurement of advertisements and product style preferences of our customers.
3. Technical management of our website.
4. Reviewing our systems

5. Providing you with information about the services we offer.
6. Letting you know about offers and news.

## **Legal Basis for Processing Data**

Three Bears Cookery Club's lawful basis for processing data are:

Consent – customers that consent to signing up for our newsletter.

Legal Obligation – tax purposes.

Contract – customers that place an order with Three Bears Cookery Club.

## **Requesting Your Information**

If you would like to review the data you have provided to us because you feel that what we presently have on record is incorrect, and/or you would like your data erased from our records, you can so do by contacting us using the contact details below.

Under GDPR you have a right to be forgotten, to withdraw your consent, to change information we hold about you, and to restrict processing.

Three Bears Cookery Club are more than happy to comply with this in accordance with the law.

## **How we protect data**

You recognise that the Internet is not a 100% secure platform for communication and, accordingly, we cannot guarantee the security of any data you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information.

We take every precaution to safeguard your information. All personal data stored by us is kept on a server in a secure environment. The computer on which data is accessed on is password protected, data held in the cloud is password protected and held on encrypted systems and third-party software have their own security systems. Physical data is stored in locked storage within secure premises.

The risks of a breach are minimal due to the precautions mentioned above being taken, and close monitoring is undertaken to ensure security systems are always up to date. Breaches will be identified, reported, managed, and resolved according to the ICO guidelines.

## **How you can help us protect your data**

Please bear in mind that whenever you willingly divulge personal data online in non-protected situations – for example on message forums, through email, or in chat spaces – that data can be collected and used by others. In short, if you post personal data online that is accessible to the public, you may receive unsolicited communications from other parties in return. Also remember to close your browser window when you have finished using the computer. This is to ensure that others cannot access your personal data and communications. If you share a computer with someone else or are using a computer in a public place like a library or Internet café. We cannot confirm or warrant the security of any data you communicate to us, and you do so at your own risk. Once we receive your communication, we make our best effort to ensure its security on our systems.

## **Further information**

If you have questions about your personal data or our privacy policy, please contact us. To see all the information we have about you, and to correct any inaccuracies, please write to us.

## **Changes to privacy policy**

We reserve the right to amend our privacy policy, whilst keeping it within all appropriate legislation and guidelines. We will do all we can to ensure that these pages show the most up to date information always and may notify you of such changes by uploading the revised privacy policy on the Three Bears Cookery Club website.

## **Cookie policy**

By visiting this website with your browser settings adjusted to allow cookies, you are consenting to Three Bears Cookery Club using cookies for the purposes described below to provide you with a fully efficient shopping experience.

## **Our cookie policy:**

Please note: to make full use of the Three Bears Cookery Club website and to benefit from a selection of personalised features, your computer, tablet or mobile phone will need to be set up to accept cookies.

- Three Bears Cookery Club uses cookies to deliver the best user experience possible, without them we wouldn't be able to do things such as remember your preferences or enable you to store products in your basket. The cookies we use don't store sensitive data such as your name, address or payment details and they can't harm your computer.
- The data we collect through these cookies is solely to improving our website and your browsing experience – it is never used to identify you and we would never share or sell on this data.

What is a cookie?

A cookie is a small text file which is downloaded and stored on your computer or mobile device by websites that you visit.

Your browser accesses the cookie file only when you visit the website that produced it. This helps to ease your navigation by automatically logging you in and remembering things like your preferences and what's in your shopping basket.

The information stored within any given cookie can only be accessed by the website that created it and cookies are limited to communicating only the information that you have disclosed to the site.

## Types of cookie:

### **Session (or Transient) Cookies**

Session cookies are stored in your computer's memory for the length of your browsing session. They become inaccessible after the session has been inactive for a time and are automatically deleted from your computer when the browser is closed. They allow you to move from page to page without having to log-in repeatedly.

### **Persistent (or Permanent) Cookies**

### **Persistent Cookies**

Persistent cookies are stored in your computer memory and are not deleted when the browser is closed. They are used to keep your preferences for the website, so they will be remembered for next time you visit the website. They are also used to collect information about the numbers of visitors, the average time spent on a particular page and analyse shopping behaviour on the website. This information is used to find out how well the website works and where it can be improved.

### **Flash Cookies (or Locally Shared Objects)**

You probably have Adobe Flash installed on your computer. Websites that contain Flash can also store small files on your computer that are used in the same way as cookies.

Flash cookies can also back up the data that is stored in other cookies. When you delete cookies, your Flash cookies are not affected. So a website may still recognise you if it backed up the deleted cookie information on a Flash cookie.

## Sharing with social networks

If you use the badges that allow you to share products and content with your friends via social networks like Twitter and Facebook, these companies may set a cookie on your computer memory. Find out more about these here:

<https://www.facebook.com/about/privacy/> <http://twitter.com/privacy>  
<http://www.google.com/intl/en-GB/policies/privacy/>

## Marketing Material

If you're **happy** to receive marketing communications by email, you may sign up for our newsletter. This means you will receive regular marketing updates including freebies, special offers, and industry news. You may unsubscribe and have the right to be forgotten at any time. We will never spam you or sell your email address to 3<sup>rd</sup> parties.

## Contact Information

Ruth Chubb – Trading as Three Bears Cookery Club

The information above can also be used to contact our registered Data Protection Officer.

Last Updated: May 2018