

# Privacy Policy

At R Tincknell & Son Ltd, we understand that we have a responsibility to protect and respect your privacy and look after your personal data. This Privacy Policy, inclusive of our Terms and conditions, explains what personal data we collect, how we use your personal data, reasons we may need to disclose your personal data to others and how we store your personal data securely.

For clarity, R Tincknell & Son Ltd may be both data controller and data processor for your personal data under certain circumstances.

## Who we are

R Tincknell & Son Ltd is a family run business now in its 4th generation of management within the Tincknell family. Tincknell Property (a trading name of R Tincknell & Son Ltd) is a commercial and residential property Landlord and developer throughout the South West. Storage Factory (a trading name of R Tincknell & Son Ltd) provides self-storage facilities and van hire. Tincknell Country Store (a trading name of R Tincknell & Son Ltd) provides retail services supplying country lifestyle products. FarmToysandMore.co.uk (a trading name of R Tincknell & Son Ltd) provides online retail services supplying farm & country Toys.

Our Registered Office is Cathedral View Offices, Wookey Hole Road, Wells, Somerset BA5 2BT and our company number is 452971.

## What Personal Data do we collect?

The personal data we collect from you directly can include your name, email address, mobile/landline telephone number, date of birth, address, your purchasing activity, payment information and information you give us when you engage with our social media platforms. We may also require documents for proof of identity, eligibility to live in the UK, Driving Licence or product specific Licenses such as Shotgun Certificates.

As we carry out a number of different activities, there may be other information that we require to process your request, the above is an example only.

We may also ask for optional data, some of which can be used for multiple processing activities, you have the right to request that we do not use the details we have for these activities, we will ask you for permission to use the data for these purposes (and record this consent on our systems).

## How do we collect personal data from you?

We receive information about you from you when you use our website, complete forms, and when you contact us by phone, email or in person or otherwise in respect of any of our products and services or during the purchasing of any such product.

Additionally, we also collect information from you when you sign up to newsletters, enter a competition, promotion or survey or when you inform us of any other matter.

If you provide us with personal data about a third party (for example when you ask us to carry out a service at a tenanted property), you warrant that you have obtained the express consent from the third party for the disclosure and use of their personal data.

Your personal data may be automatically collected when you use our website services, including but not limited to, your IP address, device-specific information and unique shopping cart numbers, the only time when this data can be used to identify you is when you complete a transaction on our websites, at other times the data is collected but only used to identify trends and patterns of usage of our sites.

# How do we use your personal data and what are our legal justifications for doing so?

## To make our products and services available to you

We use your personal data to provide you with the information, products and services that you request or purchase from us (i.e. to complete certain tasks, processes or orders, take payment, deliver your products or services and register product warranties), and to communicate with you regarding those products and services that you purchase from us and respond to your questions and comments.

We may also use your personal data to measure how satisfied our customers are and provide customer service (including troubleshooting in connection with purchases or your requests for services or when you ask us questions on social media).

We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data when you make an order for products and services. Alternatively, in some cases, we rely on our legitimate interests as a business (for example, to measure customer satisfaction and troubleshoot customer issues). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

We will not use your personal data for Marketing purposes across our Trading name companies.

## For administrative and internal business purposes

We may use your personal data for our internal business purposes, such as enhancing our website, improving our services and products and identifying usage trends. We may also use your data to monitor the use of our website and ensure that our website is presented in the most effective and relevant manner for you and your device.

It is in our legitimate interests as a business to use your personal data in this way. For example, we want to ensure our website is customer friendly and works properly and that our products and services are efficient and of high quality. We will always make sure that we balance these interests against your rights.

## For security and legal reasons

We use your personal data to:

- ensure the personal and financial information you provide us is accurate;
- conduct fraud checks or prevent other illegal activity;
- protect our rights or property (or those of others); and
- fulfil our legal and compliance-related obligations.

In some cases we will use your personal data because it's necessary for us to comply with a legal obligation (such as if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of fraud) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

## Who do we share your personal data with?

We will never sell any of your personal data to a third party. However, in order for us to provide our services to you, we share your personal data with our trusted third party service providers or our group companies, as detailed below. Whenever we share your personal data, we put safeguards in place which require these organisations to keep your data safe and to ensure that they do not use your personal data for their own marketing purposes.

### Third party service providers

#### To fulfil orders for products and services

We work with a number of trusted service providers who carry out services on our behalf. When you purchase products and services from us, the services provided by these organisations includes delivery and processing payments. It is in our legitimate interests as a business to work with these service providers since we may not have the capabilities to provide these services ourselves. In each case, we will ensure that the service provider is only allowed to use your personal data in order to provide the services to us and for no other purpose.

#### To prevent crime and comply with laws

We share your financial information with our third party card processor/ bank to ensure that your payment is safe and that your details are not being used fraudulently. This information is sent directly to the card processors and we do not hold your card details in our system, we do hold a token which can enable us to refund money but this token can in no way be used to reconstitute your card details. This data sharing enables us to conduct fraud analysis which ensures that genuine and accurate payment details are provided to us for any purchase. We may share your personal data with credit agencies if you are requesting credit.

There may be other scenarios where we are subject to a legal obligation to share or disclose your personal data, such as with law enforcement agencies or public authorities in order to prevent or detect crime or fulfil a legal requirement.

### Other professional services

We may need to disclose your personal data to our insurers where we believe that it is required under our contractual relationship with our insurance provider to do so.

### Group companies

We may share the personal data we collect with other organisations in the Tincknell Group where those other companies share various operations and business processes with us (namely Tincknell Fuels Ltd). We will do this in order to fulfil our contractual obligations to you, or because it is in our legitimate interests to do so.

## Security and retention of your personal data

### Security of your personal data

We take the security of your personal data very seriously. All information you provide to us is stored on our secured servers within the UK. We have implemented various strategies, controls, policies and measures to keep your data secure and keep these measures under close review. We protect your data by using encryption techniques and we use other safeguards such as firewalls and password protection. This means that your data is protected and only accessible by employees who need it to carry out their job responsibilities. We also ensure that there are strict physical controls in our buildings which restricts access to your personal data to keep it safe.

As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your data transmitted to our site and 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.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping the password confidential. We ask you not to share a password with anyone.

## Retention of your personal data

In broad terms, we will only retain your personal data for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the data and the reason that we have the data in the first place.

We have procedures in place regarding our retention periods which we keep under review taking into account our reasons for processing your personal data and the legal basis for doing so.

## Your rights

You have a number of rights relating to your personal information and what happens to it. You are entitled to:

- have your data processed in a fair, lawful and transparent way;
- be informed about how your personal data is being used, an example being this privacy policy;
- access personal data we hold about you; (email your requests to [dpo@tincknells.com](mailto:dpo@tincknells.com), please note that we will require proof of your identity).
- require us to correct any mistakes in your personal data;
- require us to delete personal data concerning you in certain situations where there is no good reason for us to continue to process it;
- request that we transfer your personal data to you or another service provider in a simple, structured format;
- object at any time to processing of your personal data for direct marketing purposes;
- object to automated decision making which produces legal effects concerning you or similarly significantly affects you;
- object in certain other situations to our continued processing of your personal data; and
- otherwise restrict or temporarily stop our processing of your personal data in certain circumstances.

You can read more about your rights, including the circumstances in which they apply, in the Guidance from the UK Information Commissioner's Office (ICO) <https://ico.org.uk/for-the-public>.

There are legal and accounting reasons why we will need to keep your data, but please do inform us if you think we are retaining or using your personal data incorrectly.

## Changing your preferences

If you no longer wish to be contacted by us about our products or services, or for other marketing purposes, you can amend your preferences or unsubscribe by contacting the relevant Trading name business. Alternatively, simply follow the unsubscribe link provided in emails you receive from us.

We want to ensure that all the information we have about our customers is factually correct and up to date. If you find that the personal data we have about you is inaccurate or needs updating (for instance, you may have changed your name or address) then please contact us so that we can correct it.

## Use of cookies

Our cookies policy is available to view on all of our websites.

## **Links to other sites**

We may provide links to third party sites. Since we do not control those websites, we encourage you to review the privacy policies of these third party sites. Any information that is supplied on these sites will not be within our control and we cannot be responsible for the privacy policies and practices of these.

## **Liability**

We agree to take reasonable measures to protect your data in accordance with applicable laws and in accordance with our General Terms and Conditions.

## **Data Breaches**

In the event of a data breach, we shall ensure that our obligations under applicable data protection laws are complied with where necessary.

## **Your right to make a complaint**

You have the right to make a complaint about how we process your personal data to the Information Commissioner's Office (ICO):

<https://ico.org.uk/concerns/>  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

## **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Please regularly check this policy to ensure you are aware of the most updated version. This Privacy Policy was last updated on **24th May 2018**.

Whilst we endeavour for all information in our Privacy Policy to be accurate and correct, if one part of the Policy is found to be incorrect the rest of the Policy still withstands.

## **Contact us**

Please e-mail any questions or comments you have about privacy to us at [dpo@tincknells.com](mailto:dpo@tincknells.com)