

## **Villa Farm Shop Privacy Policy**

Version 2.0

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Your right to privacy is important to us. We take the security of your information seriously and have policies and processes in place to ensure it remains safe. This notice describes the way we collect information, how we use it and how we protect it.

### **Who we are**

We are Villa Farm Produce Ltd t/a Villa Farm Shop.

Our address is: Bradley Villa Farm, Bradford Road HD2 2JX.

You can find our website at: [www.villafarmshop.co.uk](http://www.villafarmshop.co.uk).

The main point of contact for data protection is the Management and you can contact them by telephone on 01484 421782 or email at: [enquiries@villafarmshop.co.uk](mailto:enquiries@villafarmshop.co.uk).

### **How we comply with data protection regulations**

We are committed to safeguarding your personal information and we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the UK General Data Protection Regulation (UK GDPR).

### **Information we hold about you**

We collect personal information about you when you enquire about or make use of our services. Personal information we collect, and hold may include:

- Name, address, and e-mail address;
- Telephone number;
- Information about services you use, and other related information;
- Information we need to be able to process payments for you, for example bank and credit or debit card details;
- Records of contact with you, such as system notes, emails, and letters, or;
- Images and sounds captured on our CCTV system.

### **How we get and use your personal information**

Most of the personal information we process is provided to us directly by you. We will only collect, use, hold or disclose personal information where we have a lawful basis to do so. This means information needed to provide you with a product or service, to satisfy legal or regulatory requirements, or where we have your consent.

We may use your information to:

- Communicate with you;
- Keep our records up to date;
- Process payments;
- For the investigation of or prevention of crime;
- For research and statistical purposes;
- To disclose to regulatory bodies for the purposes of monitoring and/or

- enforcing our compliance with their requirements;
- Process job applications;
- Gain feedback from you;
- Prevent crime and meet our legal obligations;
- Prudentially manage our business using models and forecasts;
- Keep you informed of other relevant products or services that may be of interest to you where you have provided consent for us to do this, or;
- We record images and sounds on a closed-circuit television system for safety reasons, and to detect, prevent and prosecute crime.

### **"At the Farm Table" Loyalty Scheme**

When you sign up for our "At the Farm Table" loyalty card in-store, we collect your name, email address, and contact details to manage your loyalty benefits.

Lawful Basis:

Participation in the loyalty scheme is based on contractual necessity. We need your data to provide you with the benefits of the scheme.

Marketing communications are based on your explicit consent, which is optional and separate from your participation in the loyalty scheme.

We will only send you marketing emails, newsletters, or welcome campaigns if you have explicitly opted in at the point of sign-up by ticking the consent box on the sign up form. You can withdraw your consent at any time by:

1. Clicking the unsubscribe link in any marketing email
2. Emailing us at [enquiries@villafarmshop.co.uk](mailto:enquiries@villafarmshop.co.uk)
3. Writing to Villa Farm Shop, Bradley Villa Farm, Bradford Road HD2 2JY

**The lawful bases that we rely on for processing your information are: -**

- Your consent, which you can remove at any time.
- We have a contractual obligation.
- We have a legal obligation.
- We have a vital interest.
- We need it to perform a public task.
- We have a legitimate interest.

### **How long we keep your information**

We will keep your personal information only for as long as necessary in line with regulatory and legal requirements and will destroy it securely when it is no longer needed. We have a retention schedule that we use to manage the length of time we keep personal data and if you would like to know any specific timescales listed on it, please contact us using the contact details on this form.

For our "At the Farm Table" loyalty scheme, we retain loyalty account details for 24 months of inactivity, after which they will be securely deleted.

### **How we protect your information**

The security of your information is important to us. We protect your information by maintaining physical, electronic, and procedural safeguards in relation to the collection, storage, and disclosure of personal data to prevent unauthorised access, accidental loss, disclosure, or destruction.

No data transmission over the internet can be entirely secure, and therefore we cannot guarantee the security of your personal information and/or use of our sites. However, we use our reasonable endeavours to protect the security of your personal information from unauthorised access.

### **Where we process your information**

Your information is securely stored in the United Kingdom and through our use of MailChimp.

We may also monitor and keep records of email communications which you send to us and other communications with you in accordance with this policy and our other business interests.

### **How we share your information**

From time to time we may send information to, receive information from, or exchange your personal information with:

- Partners, agents who support us to deliver our products and services to you, or that we refer you to, or that refer you to us;
- Companies who perform essential services for us;
- Third-party organisations that conduct research, analysis, and marketing activities on our behalf;
- Regulators, courts, or other public authorities;
- The emergency services in the case of accident or emergency.

We will only share or exchange data with third parties with the protection of a written agreement and the ability to oversee their activities, unless information is required for legal or regulatory reasons.

Where we have relationships with other organisations that process your information on our behalf, we take care to ensure they have high data security standards. We will not allow these organisations to use your personal information for unauthorised purposes.

If the business is reorganised or sold to another organisation, we may transfer any personal information we hold to that organisation.

In the event that a third party may deliver all or part of the service requested by you, whilst the information you provide will be disclosed to them, it will only be used for the administration of the service provided and to maintain management information for business analysis.

### **Third-Party Processors and International Data Transfers**

We use trusted third-party providers to help us deliver our services. For our "At the Farm Table" loyalty scheme, we use Mailchimp (The Rocket Science Group LLC) to manage customer data and send marketing communications.

Mailchimp is based in the United States, and therefore your data will be transferred outside of the UK. This transfer is covered by the UK Extension to the EU-US Data Privacy Framework, which ensures that your data is protected to a standard equivalent to the UK GDPR. We have a Data Processing Addendum and Standard Contractual Clauses in place with Mailchimp to provide additional safeguards for your data.

We will never share your details with third parties for their own marketing purposes without your explicit consent.

## **Shopify**

When you buy a Villa Farm gift card online, your order is processed through Shopify, our e-commerce platform provider. Shopify acts as our data processor, handling customer data on our behalf in accordance with our instructions.

Shopify processes information necessary to complete your gift card purchase, including your contact details, payment information, device information, and gift card issuance data.

Your data may be transferred outside the UK when processed by Shopify. These transfers are covered under Shopify's Data Processing Addendum, which incorporates appropriate safeguards and UK GDPR-approved data transfer mechanisms.

If you choose to use Shop Pay at checkout, Shopify may receive your payment information directly. Villa Farm does not store or access your full payment card details.

As Shopify acts as our data processor, we may need to work with Shopify to fulfil your data rights requests (such as access, deletion, or correction of data) relating to gift card purchases. We will manage the process on your behalf.

Online gift card purchases are fulfilled digitally through our Shopify store. Shopify generates and issues gift card codes, and maintains records necessary for fulfilment, balance tracking, and fraud prevention.

## **How you can manage the information we hold and how we use it**

Data protection regulations mean you have rights over how we hold and use the information we hold about you:

- Your right to manage consents - You have the right to give your consent to us using your data for any activities we do not have a lawful basis to carry out, for example sending you marketing communications. You can withdraw consent at any time.
- Your right of Access - You have the right to request access to the information we hold about you; this is called a Data Subject Access Request.
- Your right to know about sharing - You have the right to know who your data is shared with and why.
- Your right to rectification - You have the right to have your details updated if they are inaccurate and for information not required for lawful reasons to be deleted. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to data portability - You have the right to request that information we process by automated means is sent to you or another nominated data

controller in a commonly used electronically readable format.

You are not required to pay any charge for exercising your rights. If you make a request, we will respond to you within one month.

If you wish to action any of the above, please contact us by:

- E-mailing [enquiries@villafarmshop.co.uk](mailto:enquiries@villafarmshop.co.uk)
- Writing to Villa Farm Shop, Bradley Villa Farm, Bradford Road HD2 2JY
- Telephoning us on 01484 421782

Please do not include confidential information in e-mails or letters.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact them in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or call their helpline on 0303 123 1113.

### **Changes to this policy**

We regularly review this policy. You may view the most recent version on our website at [www.villafarmshop.co.uk](http://www.villafarmshop.co.uk).