

Kitwave Group Limited and its subsidiary undertakings (Kitwave Wholesale Group) needs to collect and use personal data about people including past, present and prospective customers in order to carry on its business and meet its customers' requirements effectively. We recognise that the lawful and correct treatment of personal data is very important to successful operations and to maintaining our customer's confidence in ourselves. This policy (together with our Terms of Use/ Cookie policy) governs the collection, storage and use of personal information we collect about you, how we use your personal information and your rights to control personal information we hold about you. Please read this policy carefully. In agreeing to become a customer of Kitwave Wholesale Group and supplying us with your personal data, you are consenting to the practices described in this policy.

1. Our Policy and Contacting Us

1.1. Any personal data which we collect, record or use in any way whether it is held on paper, on computer or other media will have appropriate safeguards applied to it to ensure that we comply with the Data Protection Act 1998. We fully endorse and adhere to the eight principles of Data Protection as set out in the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The Data Protection Act principles state that personal data must be:

1.1.1. Fairly and lawfully processed

1.1.2. Processed for limited purposes and not in any other way which would be incompatible with those purposes

1.1.3. Adequate, relevant and not excessive

1.1.4. Accurate and kept up to date

1.1.5. Not kept for longer than necessary

1.1.6. Processed in line with the data subject's rights

1.1.7. Kept secure

1.1.8. Not transferred to a country which does not have adequate data protection laws.

1.2. Our purpose for holding personal data and a general description of the categories of people and organisations to whom we may disclose it are listed in the Data Protection register and we are registered with the Information Commissioner.

1.3. For the purposes of the Data Protection Act 1998, Kitwave is the Data Controller. Kitwave Group Limited is registered with company number 09892174. Our registered office is at Unit S3, Narvik Way, Tyne Tunnel Trading Estate, North Shields NE29 7XJ.

1.4. If you have any questions about how we collect, store and use personal information, or if you have any other privacy related questions, please contact us by email at privacy@eden-farm.co.uk or write to the Data Protection Officer at the above address.

1.5. In order to meet the requirements of the Data Protection Act principles, we will:

1.5.1. Observe the conditions regarding the fair collection and use of personal data

1.5.2. Meet our obligations to specify the purposes for which personal data is used

1.5.3. Collect and process appropriate personal data only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements

1.5.4. Ensure the quality of personal data used

1.5.5. Apply strict checks to determine the length of time personal data is held

1.5.6. Ensure that the rights of individuals about whom the personal data is held, can be fully exercised under the Act

1.5.7. Take appropriate security measures to safeguard personal data

1.5.8. Ensure that personal data is not transferred abroad without suitable safeguards.

2. Information we may collect from you

2.1. Information you give us: When you become a customer and fill in forms on our website www.automaticretailing.co.uk or hard copy application forms or when you email or phone us we may collect and process personal data about you. This includes information when you place an order or search for a product, enter competitions or surveys or report a problem. The information you give us may include your name, age, address, e-mail address, home and/or mobile telephone number, financial, bank and credit card information, your passwords and customer numbers. You may also be required to give us information about your business partners or directors in which case you must ensure that you have permission to do this.

2.2. Information we collect about you: When you visit our website, we may automatically collect technical information including your IP address, your login information, products you viewed or searched, browser type, plug-ins you use, operating systems and platforms. We may also collect information about your visit including URL, page response times, download errors, length of visits to certain pages, page interaction information and methods uses to browse away from a page. We may also use geo-location data that identifies your location within the UK and collect data using CCTV surveillance in our depots.

2.3. Where we collect any sensitive data, we will take appropriate steps to ensure that we have explicit consent to hold, use and retain the information. Sensitive data is personal data about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, details of the commission or alleged commission of any offence and any court proceedings relating to the commission of an offence.

3. Information we receive from other sources

3.1. We may receive information about you if you use any of the other websites we operate or other services we provide, from other Kitwave group companies or from third parties we work with such as sub-contractors we may use in technical, payment and delivery services, analytics providers, search information providers, advertising networks and credit reference agencies.

4. Cookies

4.1. Our website uses cookies to distinguish you from other users of the website. They help us to improve our site and give you a better experience when you use it. Please see our **Cookie Policy** on what cookies we use, how we use them and how you can manage them.

5. How we may use your information

5.1. If false or inaccurate information is provided and fraud suspected or identified, then this will be recorded and details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. The information may also be used to prevent theft, fraud and money laundering for example, when checking details for credit applications or managing credit accounts.

5.2. We may use your information, to manage your trading account with us and update the records we hold about you from time to time, to carry out our contractual obligations with you and to provide you with your goods and information about your goods and our services, to provide you with information via post, email, telephone or sms about other goods and services we offer that are similar to those you have already purchased or enquired about and that may be of interest to you, to make suggestions and recommendations to you about goods or services that may interest you, to welcome you into our depots and say goodbye to you when you leave, to tell you when you are in the vicinity of our depots, to analyse your purchases and purchase behaviour so we can provide a better service to you and to keep our website safe and secure.

5.3. We have a responsible marketing policy and do not give details of our customers or related individuals to any other company without your consent. We may anonymise the data we hold about you or your business and share it with our suppliers for their own marketing activities.

5.4. If you do not wish to be contacted in this way then email or write to the Data Protection Officer, privacy@eden-farm.co.uk or write to Eden Farm, 1 Cook Way, North West Peterlee, Peterlee, Co. Durham, SR8 2HY (quoting your full name, business name and customer number).

6. Disclosure of your information

6.1. We may share your information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

6.2. We may share your information with selected third parties for the performance of our contractual obligations with you such as Drop Shipment suppliers that assist us with improvement and optimisation of our site and credit reference agencies.

6.3. We may disclose your information in the event that we sell or buy any business or assets or if we are under a duty to disclose or share your personal data to comply with a legal obligation or to enforce or apply our Terms of Use/ Cookie Policy or Terms and Conditions of Sale.

7. Where we store your data

7.1. The data we collect from you will never be stored in a destination outside the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

7.2. All information you provide to us is held on our secure servers. 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 this password confidential. We ask you not to share a password with anyone.

8. What data do we hold?

8.1. Under the Data Protection Act, any individual may write to the Data Protection Officer at the above address and request a copy of the information which we hold about them. We reserve the right to charge the maximum fee payable in terms of the Data Protection Act for providing this information. If the details are inaccurate you can ask us to amend them.