

Website Privacy Policy

Quality policy statement

1. BACKGROUND

DARAY Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online.

We respect and value the privacy of everyone who visits the website, www.daray.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

2. DEFINITIONS AND INTERPRETATION

In this Policy, the following terms shall have the following meanings:

- **Personal data**
any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 or EU Regulation 2016/679 - the General Data Protection Regulation ("GDPR"); and
- **We/Us/Our**
DARAY Limited, a limited company registered in England under company number 05276678, whose registered and main trading address is Edison House, Robian Way, Swadlincote, Derbyshire DE11 9DH.

3. INFORMATION ABOUT US

Our Site is owned and operated by DARAY Limited.

Our VAT number is GB 854-7848-73.

Our Data Protection Officer can be contacted by email at DPO@daray.co.uk.

4. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

5. YOUR RIGHTS

- 5.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
- 5.1.1 The right to be informed about Our collection and use of personal data;
 - 5.1.2 The right of access to the personal data We hold about you;
 - 5.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete;
 - 5.1.4 The right to be forgotten - i.e. the right to ask Us to delete any personal data We hold about you;
 - 5.1.5 The right to restrict or prevent the processing of your personal data;
 - 5.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 5.1.7 The right to object to Us using your personal data for particular purposes;
 - 5.1.8 Rights with respect to automated decision making and profiling.
- 5.2 If you have a complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 5.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. WHAT DATA DO WE COLLECT?

Depending upon your use of Our Site, We may collect some or all of the following personal data:

- 6.1 name;
- 6.2 date of birth;
- 6.3 gender;
- 6.4 business/company name
- 6.5 job title;
- 6.6 profession;
- 6.7 contact information such as email addresses and telephone numbers;
- 6.8 demographic information such as post code, preferences, and interests;
- 6.9 financial information such as credit / debit card numbers;
- 6.10 IP address;
- 6.11 web browser type and version;
- 6.12 operating system;
- 6.13 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

7. HOW DO WE USE YOUR DATA?

- 7.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.
- 7.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 7.2.1 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);]
 - 7.2.2 Personalising and tailoring Our products and services for you;
 - 7.2.3 Replying to emails from you;
 - 7.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by following the unsubscribe link in the email.
 - 7.2.5 Market research;
- 7.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, SMS text or post with information, news, and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 7.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 7.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
 - 7.5.1 All personal data: 1 year;
 - 7.5.2 Continuing business: additional 2 years;

8. COOKIES

- 8.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 8.2 We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

- 8.3 Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful or not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, however this may prevent you from taking full advantage of the website. See *Appendix A* below for the list of Cookies we use.

9. HOW AND WHERE DO WE STORE YOUR DATA?

- 9.1 We only keep your personal data for as long as We need to in order to use it as described above, and/or for as long as We have your permission to keep it.
- 9.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 9.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

10. DO WE SHARE YOUR DATA?

- 10.1 We may share your data with other companies in Our group only for accounting purposes. This includes Our subsidiaries.
- 10.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 10.3 The third party data processors used by Us and listed below are located in the UK:
- 10.3.1 Boden Piper Limited (accountancy).
- 10.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

11. WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

- 11.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, will be transferred along with that part and the new controlling party or owner will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected.
- 11.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.



12. HOW CAN YOU CONTROL YOUR DATA?

- 12.1 In addition to your rights under the GDPR, when or when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 12.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

13. YOUR RIGHT TO WITHHOLD INFORMATION

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

14. HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at DPO@daray.co.uk.

15. CONTACTING US

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at DPO@daray.co.uk or by post at DARAY Limited, Edison House, Robian Way, Swadlincote, Derbyshire DE11 9DH. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

16. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations.

APPENDIX A

Cookie list

The table below lists the cookies we collect and the information they store:

COOKIE name	COOKIE Description
CART	Shopping cart association.
CATEGORY_INFO	Page category info.
COMPARE	Compare Products list items.
CURRENCY	Currency preference.
CUSTOMER	Encrypted store customer ID.
CUSTOMER_AUTH	Store login status flag.
CUSTOMER_INFO	Encrypted customer group.
CUSTOMER_SEGMENT_IDS	Customer Segment ID
EXTERNAL_NO_CACHE	Caching enabled/disabled flag.
FRONTEND	Server session ID.
GUEST-VIEW	Guest order edit enable.
LAST_CATEGORY	Most recent visited category.
LAST_PRODUCT	Most recent viewed product.
NEWMESSAGE	New message indicator.
NO_CACHE	Cache use permission.
PERSISTENT_SHOPPING_CART	Cart and viewing history.
POLL	Poll ID.
POLLN	Poll information.
RECENTLYCOMPARED	Recently compared items.
STF	Product information shared by email.
STORE	Selected store view and language.
USER_ALLOWED_SAVE_COOKIE	Cookie permission flag.
VIEWED_PRODUCT_IDS	Recently viewed products.
WISHLIST	Encrypted list of Wishlist products.
WISHLIST_CNT	Wishlist item quantity.

This policy has been approved and authorised by:

Name: Jeremy Bass

Position: Data Protection Officer

Date: 22nd May 2018

Signature:

