

# External Privacy Notice

(UK, EEA and EU)

## Introduction

This Privacy Notice describes the types of personal information we may collect, and how we collect and process this personal information.

## Objective

We recognise that the correct and lawful treatment of personal data will maintain confidence in our organisation and will provide for successful business operations. Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously at all times.

Please read this Privacy Notice to understand how we may use your personal data. This Privacy Notice may vary from time to time so please check it regularly. This version was last updated in April 2022.

## Strategic Imperatives

- People:** Build a high performance organisation
- Brand:** Build exceptional brands and category leading innovation
- Core Markets:** Protect and grow
- Growth Markets:** Unlock the growth
- Customers:** Be the partner of choice, listen ask questions, provide insight & solutions, act with speed
- Operating Models:** Global supply chain that drives effectiveness and efficiency
- Behaviours:** Ownership, Focus, Innovate, Results, Leadership

**Version:** 3

**Policy Name:** External Privacy Notice UK, EEA and EU

**Policy Owner:** Legal Director

**Authorised By:** Executive Committee

**Distribution:** Global

**Last Reviewed Date:** 26 April 2022

## 1 This notice

- This notice applies to you only if you are located in the United Kingdom, a member state of the European Union or the European Economic Area.
- This is the Privacy Notice of **Accolade Wines Limited** (company number 137407) whose registered office is at Thomas Hardy House, 2 Heath Road, Weybridge, Surrey, KT13 8TB, and **Accolade Wines Europe Trading Ltd** (Irish Company Number 645629) of 1st-2nd Floors, 1-2 Victoria Buildings, Haddington Road, Dublin 4, ROI (together "**Accolade Wines**").
- Accolade Wines has a commitment to privacy in accordance with the applicable privacy laws in the countries in which we operate and is committed to protecting and maintaining your privacy. We understand that when interacting with us the privacy and confidentiality of your personal information is important to you. That is why we are committed to safeguarding your personal information.
- This Privacy Notice relates to any personal information that identifies "**you**" meaning our suppliers, customers and individuals who browse our website or use our apps and other individuals outside our organisation with whom we interact. The types of personal information Accolade Wines collects will vary depending on the nature of your dealings with Accolade Wines. We refer to this personal information throughout this Privacy Notice as "**personal data**" and paragraph 3 below sets out further detail of what this includes.
- This Privacy Notice describes the types of personal information we may collect, and how we collect and process this personal information.
- Please read this Privacy Notice to understand how we may use your personal data. This Privacy Notice may vary from time to time so please check it regularly. This version was last updated May 2022.

## 2 Data controller

- The data controller for the UK will be: **Accolade Wines Limited** (company number 137407) Thomas Hardy House, 2 Heath Road, Weybridge, Surrey KT13 8TB.
- The data controller for the EU and EEA will be: **Accolade Wines Europe Trading Ltd** (Irish Company Number 645629) of 1st-2nd Floors, 1-2 Victoria Buildings, Haddington Road, Dublin 4, ROI.
- If you wish to access or correct your personal data held by us, or to complain about a possible breach of privacy or for any other enquiries these should be directed to the Data Protection Manager using the following details:

By Email: [privacy@accoladewines.com](mailto:privacy@accoladewines.com)

or

By Post:

UK:

FAO: Data Protection Manager  
Accolade Wines Limited  
Thomas Hardy House, 2 Heath Road,  
Weybridge, Surrey, KT13 8TB

EU/EEA:

FAO: **Accolade Wines Europe Trading Ltd.** (Irish Company Number 645629) of 1st-2nd Floors, 1-2

Victoria Buildings, Haddington  
Road, Dublin 4, ROI.

- You have the right to make a complaint at any time to the relevant supervisory authority (which, in the UK, is the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) and for Republic of Ireland is the Data Protection Commissioner (DPC), the Irish supervisory authority for data protection issues (<https://www.dataprotection.ie>)).

### 3 What personal data do we collect?

- The categories of personal data about you which we may collect are:
  - (a) **Individual Data** which includes personal data which relates to your identity, such as your first name, middle name, last name, username or similar identifier, marital status, title, date of birth and gender, and your billing address, delivery address, email address and telephone numbers which you provide to us in person, via our website, apps or by telephone;
  - (b) **Account and Profile Data** which includes personal data which relates to your account with us or profile on our website or apps, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
  - (c) **Economic and Financial Data** which includes personal data which relates to your finances, such as your bank account and payment card details and, for the purposes of the prevention of fraud, such personal data may also include your passport (where you provide this to us) and any VAT registration details;
  - (d) **Sales Data** which includes personal data which relates to the transactions you have conducted with us, such as details about payments to and from you, details of subscriptions to our services or publications and other details of products and services you have purchased from us;
  - (e) **Information Technology Data** which includes personal data which relates to your use of our website or apps, such as your IP address, login data, and traffic data;
  - (f) **Audio and Visual Data** which includes personal data which is gathered using our CCTV or other recording systems at our locations in the form of images, video footage and sound recordings;
  - (g) **Advertising and Marketing Data** which includes personal data which relates to your marketing preferences, such as information about your preferences in receiving marketing materials from us and our third parties and your communication preferences as well as your personal interests (where you provide this to us);
  - (h) **Market Research Data** which includes personal data which is gathered for the purposes of market research;
  - (i) **Health Data** which includes personal data which is gathered for health and safety purposes including any accident report or claim log and dietary preferences.
- We may also create personal data about you, for example, if you contact us by telephone to make a complaint, for example about our services or goods, then we may make a written record of key details of the conversation so that we can take steps to address the complaint.
- We also obtain and use certain aggregated data such as statistical or demographic data for any purpose ("**Aggregated Data**"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your

operational data to calculate the percentage of users accessing a specific feature on our website or apps. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

- In addition, we may from time to time obtain certain special categories of your data including, for example, concerning health ("**Special Categories of Data**"), and this Privacy Notice sets out how we may process these types of personal data. For example, if there was an incident at one of our properties, we may need to process your health data for health and safety requirements or to complete an accident form.

#### 4 How we collect your personal data

- We collect your personal data from the following sources:
  - (a) **Directly from you**, either in person (at our locations or otherwise), via our website or by telephone. This could include personal data which you provide when you:
    - Apply for our products or services;
    - Create an account on our website or apps;
    - Become a member of one of our wine clubs;
    - Engage with us on social media;
    - Install or download one of our apps;
    - Contact us with a query or complaint;
    - Subscribe to our services or publications;
    - Request information on our services or products or for other marketing to be sent to you;
    - Enter into a competition or promotion;
    - Complete a survey from us or give us feedback; and
    - When you visit any of Accolade Wines premises.
  - (b) **Automated technologies**, such as CCTV or other recording systems (in the event this is over the telephone we will notify you beforehand), cookies, server logs and other similar technologies. Audio and Visual Data may be collected on you for security purposes if you attend any of our premises.
  - (c) **Third parties**, such as:
    - Analytics providers;
    - Providers of technical, payment and delivery services; and
    - Data brokers or aggregators.
  - (d) **Publicly available sources or "trusted" sources**, such as:
    - Companies House;
    - HM Land Registry;
    - Tax authorities and credit and default reference agencies; and
    - Banks and other financial institutions.

## 5 How we use your personal data and our basis for using it

### Where we are relying on a basis other than consent:

- We may rely on one or more of the following legal bases when processing your personal data. Where we have identified what our legitimate interests are, please note that these are our legitimate interests in carrying out the processing, which are not overridden by your interests, fundamental rights or freedoms. We have also set out below the purposes for which we may process your personal data.

| Purposes for which we process your personal data  | Type of personal data used (see above for more details)   | The lawful basis on which we can do this  |
|---|---|---|
| To register you as a new customer or supplier or a member of an Accolade wine club.   | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Economic and Financial Data;</li> <li>Account and Profile Data.</li> </ul> | <p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>to <b>perform a contract</b> with you; and</li> <li>for our <b>legitimate interest</b> in the provision of goods and services to our customers.</li> </ul>               |
| <p>To process and perform any order placed by you or orders placed by us where you are a supplier or customer including:</p> <ul style="list-style-type: none"> <li>payments, fees and charges;</li> <li>collecting and recovering money owed.</li> </ul> | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Economic and Financial Data;</li> <li>Sales Data.</li> </ul>               | <p>The processing is necessary:</p> <ul style="list-style-type: none"> <li><b>to perform any contract</b> entered into with you; and</li> <li>for our <b>legitimate interests</b> (to recover debts due to us).</li> </ul>                          |
| In order to comply with our own legal obligations, e.g. health and safety legislation, or to assist in an investigation (for example if there was an incident at our premises).   | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Audio and Visual Data;</li> <li>Health Data.</li> </ul>                    | The processing is necessary for us to <b>comply with the law, social protection law</b> in the case of a health and safety incident recorded at any of our premises or in order to protect the <b>vital interests</b> of you or another individual. |
| In order to use your personal data in life or death situations and there is no time to gain your consent (e.g. in the event of an accident and we have to give your personal details to medical personnel).   | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Health Data.</li> </ul>  | The processing is necessary for us to <b>comply with the law, social protection law</b> and in order to protect the <b>vital interests</b> of you or another individual.  |
| <p>In order to manage our relationship with you including:</p> <ul style="list-style-type: none"> <li>to send you important notices such as communications</li> </ul>   | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Account and Profile Data;</li> </ul>                                       | <p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>to <b>perform any contract</b> entered into with you;</li> </ul>   |

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| <p>about changes to our terms and conditions and policies (including this Privacy Notice);</p> <ul style="list-style-type: none"> <li>to provide you with important information about products or services you have ordered from us (e.g. a change of time or location due to unforeseen circumstances);</li> <li>to send you information you have requested;</li> <li>wine club membership;</li> <li>to deal with your enquiries; and</li> <li>to ask you to leave a review or feedback on us.</li> </ul> | <ul style="list-style-type: none"> <li>Sales Data;</li> <li>Advertising Marketing Data.</li> </ul> <p style="text-align: right;">and</p>   | <ul style="list-style-type: none"> <li><b>to comply with the law;</b> and</li> <li>for our <b>legitimate interests</b> in the management and operation of our business, to keep our records updated and to study how customers use our products/services.</li> </ul>   |
| <p>In order to administer and protect our business, deal with any misuse including of our website or apps and to comply with our security policies at our premises.</p>  | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Account and Profile Data;</li> <li>Audio and Visual Data;</li> <li>Information and Technology Data.</li> </ul>                          | <p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>for our <b>legitimate interest</b> in provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise; and</li> <li>necessary <b>to comply with the law.</b></li> </ul> |
| <p>In order to make suggestions and recommendations to you about goods or services that may be of interest to you, deliver relevant website or app content and advertisements to you and to measure or understand the effectiveness of our advertising.</p>  | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Sales Data;</li> <li>Information Technology Data;</li> <li>Advertising Marketing Data.</li> </ul> <p style="text-align: right;">and</p> | <p>The processing is necessary for our <b>legitimate interests</b> (to study how customers use our products/services, to develop our products and services and ensure our marketing is relevant to you, to grow our business and to inform our marketing strategy).</p>  |
| <p>For internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and to improve our website, apps products/services, marketing, customer relationships and experiences.</p>  | <ul style="list-style-type: none"> <li>Individual Data;</li> <li>Information Technology Data;</li> <li>Advertising Marketing Data;</li> <li>Market Research Data.</li> </ul>                             | <p>The processing is necessary for our <b>legitimate interests</b> in defining types of customers for our products and services, to keep our website and apps updated and relevant, to develop our business and to inform our marketing strategy.</p>  |

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| <p>To communicate with you about, and administer your participation in, special events, programs, promotions, any prize draws or competitions.</p>   | <ul style="list-style-type: none"> <li>• Individual Data;</li> <li>• Account and Profile Data;</li> <li>• Sales Data;</li> <li>• Information and Technology Data;</li> <li>• Advertising and Marketing Data.</li> </ul>   | <p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• For <b>performance of a contract</b> with you; and</li> <li>• Necessary for our <b>legitimate interests</b> to promote our business.</li> </ul> |
| <p>To sell, make ready for sale or dispose of our business in whole or in part including for intragroup activities, investment, financing or to any potential buyer or their advisers.</p> | <ul style="list-style-type: none"> <li>• Individual Data;</li> <li>• Account and Profile Data;</li> <li>• Sales Data;</li> <li>• Information and Technology Data;</li> <li>• Advertising and Marketing Data;</li> <li>• Economic and Financial Data;</li> <li>• Health Data.</li> </ul> | <p>The processing is necessary for our <b>legitimate interests</b> in the sale or disposal of our business or assets.</p>  |
| <p>In order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties.</p>  | <ul style="list-style-type: none"> <li>• Individual Data;</li> <li>• Account and Profile Data;</li> <li>• Sales Data; and</li> <li>• Economic and Financial Data.</li> </ul>  | <p>The processing is necessary for our <b>legitimate interests</b> in protecting our business and property and recovering debts owed to us.</p>  |
| <p>For recruitment purposes</p>  | <ul style="list-style-type: none"> <li>• Individual Data;</li> <li>• Health Data</li> </ul>   | <p>The processing is necessary for our <b>legitimate interests</b> in securing new employees for our business.</p>   |

**Where we may rely on consent:**

- We would like to use your personal data for a variety of different purposes. For certain of these purposes it is appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.
- Where we rely on consent you may at any time withdraw the specific consent you give to our processing your personal data by logging into your account and managing your preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

**6 Who receives your personal data**

We may disclose your personal data to:

- Our group companies and affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;



- HMRC, legal and other regulatory authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;
- External professional advisers such as accountants, auditors, bankers, insurers and lawyers;
- Law enforcement agencies, courts or other relevant parties, to the extent necessary for the establishment, exercise or defence of legal rights;
- Third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences, including but not limited to fraud prevention, or the execution of criminal penalties;
- Third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation); and
- Third parties operating plugins or content (such as Facebook, Twitter, Instagram) on our website or apps which you choose to interact with.

## **7 International transfers of personal data**

It is possible that personal data we collect from you may be transferred, stored and/or processed outside the United Kingdom or the European Economic Area. In connection with such transfers these are made on the following bases including:

- Appropriate safeguards are in place, such as standard contractual clauses between us and the recipient (a copy of which can be obtained by using the contact details set out in paragraph 2); or
- Is made on the basis of an adequacy decision, such as: the United Kingdom or the European Commission (as applicable) has decided that the relevant country receiving the personal data ensures an adequate level of protection; or
- Another reason applies, for example the transfer is necessary for legal claims, to protect the vital interests of an individual or is necessary for the performance of a contract, public interest or with consent.

## **8 How long we will store your personal data for**

We will store your personal data for the time period which is appropriate and in accordance with our data retention criteria set out below. We keep the length of time that we hold your personal data for under regular review. These reviews take place annually. The criteria include:

- The purpose for which the personal data is used;
- Our legal obligations and other legal requirements; and
- The type and amount of data and whether it is special data.

## **9 Contractual or statutory requirements on you to provide personal data**

- In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract or necessary to enter into a contract.
- It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of such failure could mean, for example, that we may not be able to perform to the level you expect under our contract with you.

## **10 Accuracy of your personal information**

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the



accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us by emailing us on [privacy@accoladewines.com](mailto:privacy@accoladewines.com).

## **11 Your rights in relation to your personal data**

In addition to your ability to withdraw any consent you may have given to our processing your personal data, you may have a number of rights in connection with the processing of your personal data, including:

- The right to request access to your personal data that we process or control;
- The right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- The right to request, on legitimate grounds (as specified in law) erasure or restriction in the processing of your personal data that we process or control;
- The right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- The right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- The right to lodge complaints regarding the processing of your personal data with the relevant supervisory authority (which in the UK is the Information Commissioner's Office and for Republic of Ireland is the Data Protection Commissioner (DPC), the Irish supervisory authority for data protection issues). Please see <https://ico.org.uk/concerns/> for how to do this in the UK and [www.dataprotection.ie](http://www.dataprotection.ie) for how to do this in the ROI.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 2 above.

## **12 Links to other websites or apps**

This policy only applies to Accolade Wines, if you link to another website or app, you should remember to read and understand that website's privacy policy as well. We are not responsible for any use of your personal data that is made by unconnected third party websites or apps.

## Further Information

For further information please contact us on [privacy@accoladewines.com](mailto:privacy@accoladewines.com).

## Associated/Reference Documents

- **Privacy Policy**