

Wray Village Store

The heart of the community

Personal Data Privacy Policy

Version	Date Approved by the Trustees	Date of next review

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1. Introduction to the UK-GDPR

Under the Data Protection Act 2018 and the United Kingdom General Data Protection Regulations (UKGDPR) Wray Village Store Ltd (herein after referred to as “the Company”) is required to comply with the UK-GDPR and undertakes to do so.

Throughout this policy document, numbers prefixed by “Art:“ in brackets (*eg: {Art:5}*) refer to the relevant Article(s) in the UK-GDPR, as modified by the Keeling Schedule.

2. Definitions

{Precised from Art:4}

The definitions of terms used in this policy are the same as the definitions of those terms detailed in Article-4 of the UK-GDPR.

Data Subject

A data subject is an identifiable natural person about whom the Company holds personal data.

Contact Information

For the purposes of this Policy, “Contact Information” means any or all of the person’s:

- full name (including any preferences about how they like to be called);
- full postal address;
- telephone and/or mobile number(s);
- e-mail address(es).

3. Principles of the UK-GDPR

{Precised from Art:5}

The Company will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK-GDPR in order to safeguard the rights and freedoms of individuals; and

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. Lawful Processing

{Precised from Art:6}

The Company will obtain, hold and process all personal data in accordance with the UK-GDPR for the following lawful purposes. In all cases the information collected, held and processed will include Contact Information (as defined in 2 above).

4.1 By Consent

People who are interested in, and wish to be kept informed of, the activities of the Company. Subject to the person's consent, this may include information selected and forwarded by the Company on activities by other organisations which are relevant to those of the Company.

Note: this will not involve providing the person's personal data to another organisation. The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed. The information provided will be held and processed solely for the purpose of providing the information requested by the person.

4.2 By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from the Company.

The information collected will additionally contain details of:

- The goods/services being sold to, or purchased from the Company;
- Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the Company.
- The information provided will be held and processed solely for the purpose of managing the contract between the Company and the person for the supply or purchase of goods/services.

4.3 By Legal Obligation

People where there is a legal obligation on the Company to collect, process and share information with a third party – eg: the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees of the Company.

The information provided will be held, processed and shared with others solely for the purpose meeting the Company's legal obligations.

4.4 By Vital Interest

The Company undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

4.5 Task in the Public Interest

The Company undertakes no tasks in the public interest which require the collection, holding and/or processing of personal information.

4.6 Legitimate Interest

Volunteers, Including Trustees

In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of the Company to hold such personal information on its volunteers and trustees as will enable the Company to communicate with its volunteers on matters relating to the operation of the Company, *eg*:

- ✓ the holding of meetings;
- ✓ providing information about the Company's activities – particularly those activities which, by their nature, are likely to be of particular interest to individual volunteers/trustees;
- ✓ seeking help, support and advice from volunteers/trustees, particularly where they have specific knowledge and experience;
- ✓ ensuring that any particular needs of the volunteer/trustee are appropriately and sensitively accommodated when organising meetings and other activities of the Company.

Closed Circuit TV (CCTV) Recording

The Company collects video CCTV images of people entering and moving around its premises in order to safeguard its collection from theft and vandalism, as required by its insurers.

The information collected is only processed and, where appropriate, shared with other authorities (*eg*: the Police) where it is necessary to investigate and/or detect a potential crime.

5. Individual Rights

5.1 The right to be informed

{Precised from Arts: 12-14}

When collecting personal information the Company will provide to the data subject free of charge, a Privacy Policy written in clear and plain language which is concise, transparent, intelligible and easily accessible containing the following information:

- ✓ Identity and contact details of the controller
- ✓ Purpose of the processing and the lawful basis for the processing
- ✓ The legitimate interests of the controller or third party, where applicable
- ✓ Categories of personal data;
Not applicable if the data are obtained directly from the data subject
- ✓ Any recipient or categories of recipients of the personal data
- ✓ Details of transfers to third country and safeguards
- ✓ Retention period or criteria used to determine the retention period
- ✓ The existence of each of data subject's rights
- ✓ The right to withdraw consent at any time, where relevant
- ✓ The right to lodge a complaint with a supervisory authority

- The source the personal data originates from and whether it came from publicly accessible sources
Not applicable if the data are obtained directly from the data subject
- Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data
Not applicable if the data are NOT obtained directly from the data subject
- The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

- In the case of data obtained directly from the data subject, the information will be provided at the time the data are obtained.
- In the case that the data are not obtained directly from the data subject, the information will be provided within a reasonable period of the Company having obtained the data (within one month), **or**,
- if the data are used to communicate with the data subject, at the latest, when the first communication takes place; **or**
- if disclosure to another recipient is envisaged, at the latest, before the data are disclosed.

5.2 The right of access

{Precised from Art:15}

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to his/her personal data and the information detailed in the Company's relevant Privacy Policy:

5.3 The right to rectification

{Precised from Art:16}

The data subject shall have the right to require the controller without undue delay to rectify any inaccurate or incomplete personal data concerning him/her.

5.4 The right to erase *{The right to be forgotten}*

{Precised from Art:17}

Except where the data are held for purposes of legal obligation or public task (4.3 or 4.5) the data subject shall have the right to require the controller without undue delay to erase any personal data concerning him/her.

5.5 The right to restrict processing

{Precised from Art:18}

Where there is a dispute between the data subject and the Controller about the accuracy, validity or legality of data held by the Company the data subject shall have the right to require the controller to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

5.6 The right to data portability

{Precised from Art:20}

Where data are held for purposes of consent or contract (4.1 or 4.2) the data subject shall have the right to require the controller to provide him/her with a copy in a structured,

commonly used and machine-readable format of the data which he/she has provided to the controller, and have the right to transmit those data to another controller without hindrance.

5.7 The right to object

{Precised from Art:21}

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him/her which is based Public Task or Legitimate Interest (4.5 or 4.6), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Rights in relation to automated decision making and profiling

{Precised from Art:22}

Except where it is: a) based on the data subject's explicit consent, *or* b) necessary for entering into, or performance of, a contract between the data subject and a data controller; the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

6. Operational Policies & Procedures – The Context

Wray Village Store Limited (the Company) is a small Company holding just a small amount of non-sensitive data on a small number of people.

The Trustees understand and accept their responsibility under the UK General Data Protection Regulation (UK-GDPR) to hold all personal data securely and use it only for legitimate purposes with the knowledge and approval of the data subjects.

By the following operational policies and procedures the Trustees undertake to uphold the principles and requirements of the UK-GDPR in a manner which is proportionate to the nature of the personal data being held by the Company. The policies are based on the Trustees' assessment, in good faith, of the potential impacts on both the Company and its data subjects of the personal data held by the Company being stolen, abused, corrupted or lost.

7. Personnel

7.1 Data Protection Officer

In the considered opinion of the Trustees the size of the business, and the scope and nature of the personal data held by the Company, it is not sufficient to warrant the appointment of a Data Protection Officer. Accordingly, no Data Protection Officer is appointed.

7.2 Data Controller

The Board of Trustees is the Data Controller for the Company.

7.3 Data Processor

Third parties appointed to hold personal data on behalf of the company to facilitate its operations are its processors. Data processors may include IT suppliers, contractors, etc.

7.4 Access to Data

Except where necessary to pursue the legitimate purposes of the Company, only people authorised by the Trustees shall have access to the personal data held by the Company.

7.5 Training

The Board of Trustees will periodically undergo appropriate training commensurate with the scale and nature of the personal data that the Company holds and processes under the UK-GDPR.

8. Collecting & Processing Personal Data

The Company collects a variety of personal data commensurate with the variety of purposes for which the data are required in the pursuit of its charitable objects.

All personal data will be collected, held and processed in accordance with the relevant Data Privacy Notice provided to data subjects as part of the process of collecting the data.

A Data Privacy Notice will be provided, or otherwise made accessible, to all persons on whom the Company collects, holds and processes data covered by the UK-GDPR. The Data Privacy Notice provided to data subjects will detail the nature of the data being collected, the purpose(s) for which the data are being collected and the subjects rights in relation to the Company's use of the data and other relevant information in compliance with the prevailing UK-GDPR requirements.

9. Information Technology

9.1 Data Protection by Design/Default

Inasmuch as:

- The Company's Trustees are not expected to be data protection professionals;
- it would be a disproportionate use of charitable funds to employ a data protection professional, given the scale and nature of the personal data held by the Company;
- the Trustees will seek appropriate professional advice commensurate with its data protection requirement whenever they are planning to make significant changes to the ways in which they process personal data; or
- there is any national publicity about new risks (eg: cyber attacks);
- any material changes to the UK-GDPR are proposed or have been made where which might adversely compromise the Company's legitimate processing of personal data covered by the UK-GDPR.

Personal data will never be transmitted electronically (eg: by e-mail) unless securely encrypted.

9.2 Data Processing Equipment

The scale and nature of the personal data held by the Company is not sufficient to justify the Company purchasing dedicated computers for the processing of personal data. Instead the Company will purchase and own at least 2 and not more than 5 removable storage devices to store the personal data that it holds and processes. The removable storage devices will also act as backup devices.

Whilst the data will be processed on the computers/laptops to which the Trustees' authorised persons will have access, no personal data covered by the UK-GDPR will be stored on those computers/laptops. Personal data will, instead be stored in cloud based applications. All interim working data transferred to such computers/laptops for processing will be deleted once processing has been completed.

When not in use the removable storage devices will be kept in a secure location and reasonably protected against accidental damage, loss, avoidable theft or other misuse by persons other than the Data Processors.

The Company Trustees will keep a register of

- the location of all removable devices used for the storage and processing of personal data;
- each occasion when the data on each device were accessed or modified and by whom.
- The Company's removable storage devices shall not be used for the storage of any data which are unrelated to the Company's processing of personal data.

9.3 Data Processing Location

The Company shall only process the Company's personal data in a secure location, and not in any public place, *eg*: locations where the data could be overlooked by others, or the removable data storage devices would be susceptible to loss or theft.

Computers/laptops in use for data processing will not be left unattended at any time.

9.4 Data Backups

To protect against loss of data by accidental corruption of the data or malfunction of a removable data storage device (including by physical damage), all the Company's personal data shall be backed up periodically and whenever any significant changes (additions, amendments, deletions) are made to the data.

Backup copies of the data shall be held in separate secure locations which are not susceptible to common risks (*eg*: fire, flood, theft).

As far as is reasonably practical, all files containing personal data covered by the UK-GDPR will be encrypted by the use of NCH-Meo, Kaspersky Vault or other comparable software. The encryption keys will be held securely in a location which is separate from the data storage media.

9.5 Obsolete or Dysfunctional Equipment (Disposal of Removable Storage Media)

Equipment used to hold personal data, whether permanently or as interim working copies, which come to the end of their useful working life, or become dysfunctional, shall be

disposed of in a manner which ensures that any residual personal data held on the equipment cannot be recovered by unauthorised persons.

Inasmuch as:

- this will be a relatively infrequent occurrence;
- techniques for data recovery and destruction are constantly evolving;
- none of the Trustees have relevant up-to-date expert knowledge of data cleansing;

equipment which becomes obsolete or dysfunctional shall not be disposed immediately. Instead it will be stored securely while up-to-date expert advice on the most appropriate methods for its data cleansing and disposal can be sought and implemented.

10. Data Subjects

10.1 The Rights of Data Subjects

In compliance with the UK-GDPR the Company will give data subjects the following rights. These rights will be made clear in the relevant Data Privacy Notice provided to data subjects:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right of erasure
- the right to restrict processing;
- the right to data portability;
- the right to object;
- the right not to be subjected to automated decision making, including profiling.

The above rights are not available to data subjects when the legal basis on which the Company is holding & processing their data are:

- Subject Consent;
- Contractual obligation
- Legal Obligation
- Legitimate Interest

10.2 Rights of Access, Rectification and Erasure

Data subjects will be clearly informed of their right to access their personal data and to request that any errors or omissions be corrected promptly.

Such access shall be given and the correction of errors or omissions shall be made free of charge provided that such requests are reasonable and not trivial or vexatious.

There is no prescribed format for making such requests provided that:

- the request is made in writing, signed & dated by the data subject (or their legal representative);
- the data claimed to be in error or missing are clearly and unambiguously identified;
- the corrected or added data are clear and declared by the subject to be complete and accurate.

It will be explained to subjects who make a request to access their data and/or to have errors or omissions corrected, or that their data be erased, that, while their requests will be actioned as soon as is practical there may be delays where the appropriate volunteers or staff to deal with the request do not work on every normal weekday.

Where a data subject requests that their data be rectified or erased the Data Controller and Data Processor will ensure that the rectifications or erasure will be applied to all copies of the subject's personal data including those copies which are in the hands of a Third Party for authorised data processing.

10.3 Right of Portability

The Company will only provide copies of personal data to the subject (or the subject's legal representative) on written request.

The Company reserves the right either:

- to decline requests for portable copies of the subject's personal data when such requests are unreasonable (*ie*: excessively frequent) or vexatious;
or
- to make a reasonable charge for providing the copy.

10.4 Data Retention Policy

Personal data shall not be retained for longer than:

- In the case of data held by subject consent: the period for which the subject consented to the Company holding their data;
- in the case of data held by legitimate interest of the Company: the period for which that legitimate interest applies. For example: in the case of data subjects who held a role, such as a volunteer, with the Company the retention period is that for which the Company reasonably has a legitimate interest in being able to identify that individual's role in the event of any retrospective query about it;
- In the case of personal data collected through CCTV, [one calendar month]
- in the case of data held by legal obligation: the period for which the Company is legally obliged to retain those data.

The Company shall regularly – not less than every 6 months – review the personal data which it holds and remove any data where retention is no longer justified. Such removal shall be made as soon as is reasonably practical, and in any case no longer than 20 working days (of the relevant Data Processor) after retention of the data was identified as no longer justified.

11. Privacy Impact Assessment

11.1 Trustees' Data

The volume of personal data is very low – less than 15 individuals

The sensitivity of the data is low-moderate: the most sensitive data being date of birth, previous names and previous addresses;

The risk of data breach is small as the data are rarely used, with the majority of the data being held for a combination of legal obligation and legitimate interest.

Overall impact: LOW

11.2 Volunteers'/Members' Data

The volume of personal data is low – less than 150 individuals

The sensitivity of the data is low: the most sensitive data being bank details and an e-mail address;

The risk of data breach is small – primarily the accidental disclosure.

Overall impact: Moderate.

11.3 Supporters,' Enquirers' and Customers' Data

The volume of personal data is low-moderate.

The sensitivity of the data is low: the most sensitive data being an e-mail address;

The risk of data breach is small – primarily the accidental disclosure of names & e-mail addresses.

Overall impact: LOW

12. Third Party Access to Data

Under no circumstance will the Company share with, sell or otherwise make available to Third Parties any personal data except where it is necessary and unavoidable to do so in pursuit of its objects as authorised by the Trustees.

Whenever possible, data subjects will be informed in advance of the necessity to share their personal data with a Third Party in pursuit of the Company's objects.

Before sharing personal data with a Third Party the Company will take all reasonable steps to verify that the Third Party is, itself, compliant with the provisions of the UK-GDPR and confirmed in a written contract. The contract will specify that:

- ✓ The Company is the owner of the data;
- ✓ The Third Party will hold and process all data shared with it exclusively as specified by the instructions of the Data Controller;
- ✓ The Third Party will not use the data for its own purposes;
- ✓ The Third Party will adopt prevailing industry standard best practice to ensure that the data are held securely and protected from theft, corruption or loss;
- ✓ The Third Party will be responsible for the consequences of any theft, breach, corruption or loss of the Company's data (including any fines or other penalties imposed by the Information Commissioner's Office) unless such theft, breach, corruption or loss was a direct and unavoidable consequence of the Third Party complying with the data processing instructions of the Data Controller
- ✓ The Third Party will not share the data, or the results of any analysis or other processing of the data with any other party without the explicit written permission of the Company Trustees;
- ✓ The Third Party will securely delete all data that it holds on behalf of the Company once the purpose of processing the data has been accomplished.
- ✓ The Company does not, and will not, transfer personal data out of the UK or the European Union.

13. Data Breach

In the event of any data breach coming to the attention of the Company, the Trustees will immediately investigate and if necessary report the breach to the Information Commissioner within 72 hours.

In the event that full details of the nature and consequences of the data breach are not immediately accessible (*e.g.* because volunteers do not work on every normal weekday) the Trustees will undertake to investigate the potential breach and, where necessary, forward the relevant information to the Information Commissioner as soon as it becomes available.

14. Privacy Policy & Privacy Notices

The Company will have a Privacy Policy and appropriate Privacy Notices which it will make available to everyone on whom it holds and processes personal data, in accordance with 5.1.

In the case of data obtained directly from the data subject, the Privacy Notice will be provided at the time the data are obtained.

In the case that the data are not obtained directly from the data subject, the Privacy Notice will be provided within a reasonable period of the Company having obtained the data (within one month), *or*,

if the data are used to communicate with the data subject, at the latest, when the first communication takes place; *or*

if disclosure to another recipient is envisaged, at the latest, before the data are disclosed.

15. Privacy Notice

This privacy notice explains how our organization uses the personal data we collect from you when you work for us, or use our services or website.

Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

16. What data do we collect?

Our Company collects the following data for the purposes of managing our employees, volunteers and shareholders:

- Personal identification information (Name, email address, phone number, etc.);
- Where necessary, bank account details

17. How do we collect your data?

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.
- Apply for shares.
- By entering our store premises.

Our Company may also receive your data indirectly from the following sources:

- Contracts we enter into with third parties

18. How will we use your data?

Our Company collects your data so that we can:

- Process your order and manage your account.
- Email you with special offers on other products and services we think you might like.
- Maintain our list of volunteers
- Maintain our obligations as an employer
- Manage security in our premises, prevent and deter crime

If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services.

When Our Company processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

19. How do we store your data?

Our Company securely stores your data at [...].

Our Company will keep your [enter type of data] for [enter time period]. Once this time period has expired, we will delete your data by [enter how you delete users' data].

20. Marketing

Our Company would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies. If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group.

If you no longer wish to be contacted for marketing purposes, please click [here](#).

21. What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company’s processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: wraycommunityshop@gmail.com

22. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

23. How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

24. What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

25. How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

26. Privacy policies of other websites

The Our Company website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

27. Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 9 January 2019.

28. How to contact us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: shop@wrayvillagestore.co.uk

29. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

<https://ico.org.uk/make-a-complaint/>