

## PRIVACY POLICY

This is our data protection and privacy policy which explains who Clarriets is, how we process personal data and, if you are the subject of any of the personal data concerned, **what rights you have** and **how to get in touch with us** if you need to.

### **Who we are**

We are founded on the principle of ensuring that our customers enjoy the experience of shopping with us. We know that you may be concerned about the privacy of information you share with us. We take the privacy and security of your personal details very seriously and are committed to protecting them. Here we outline our Privacy Policy, which sets out how we handle the information we collect about you when you visit our website and use our services.

This Privacy Policy covers how Clarriets may use your data. If you have any questions about how any member of Clarriets uses your information, please contact Clarriets using the **contact and other details** set out at the end of this policy.

This privacy policy covers all of our websites.

### **The purposes for which we collect personal data**

We collect and process personal data as follows:

#### **If you are a customer of ours or if you have registered to join our online community**

We may collect your individual contact information to enable us to communicate with you in relation to the provision of goods or services by us (for example, in order to provide the relevant goods or services) and other personal information relating to you to in the course of providing the goods or services concerned (for example, credit card, bank account or other financial details, and other information relating to you that is included in any communications between us and you in the course of provision of the goods or services).

#### **If you browse any of our websites**

We may collect information on your visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive. We may keep a record of the content on our website that you have clicked on and use that information to target advertising on this website to you that is relevant to your interests and which we have identified based on content you have looked at. This may involve the use of cookies, which is explained in our **cookie policy**.

#### **If you share any of our web pages on social media**

If you share any of our web pages on social media, we use a third party service called AddThis to facilitate this, and this involves use of a cookie set by AddThis which collects data relating to your use of our website and other websites that you visit, which is then used to target advertising to you that is relevant to your interests. More information on this is contained in our **cookie policy**.

#### **If we wish to send you advertising, marketing or promotional material**

We may collect your individual contact details in order to send you direct marketing material in order to advertise, market or promote our goods and services (this will be subject to your prior consent where appropriate). We may combine this with other information we obtain about the

things you are interested in and that are relevant to the services provided by us (for example, when you buy something from us or browse our website and view particular content) in order to help us ensure that marketing material that we send you is relevant to what you are interested in.

**If you provide goods or services (or you work for someone who supplies goods or services) to us.**

We may collect your individual contact information to enable us or other suppliers of ours to communicate with you in relation to the provision of goods or services by you or the person that you work for (for example, in relation to the management and administration of the provision of the relevant goods or services) and other personal information relating to you to in the course of provision of the goods or services concerned. This may include, for example, bank account or other financial details, and other information relating to you that is included in any communications between us and you or anyone you work with in the course of provision of the goods or services.

**If we are assessing your suitability or ability to provide goods or services to us or to any of our group companies**

We may collect relevant personal information relating to you to the extent necessary to enable that assessment to take place – for example, if we need to assess or confirm your age, your right to work in the EU, your skills and previous experience, your qualifications or whether there is anything that would adversely affect your suitability or ability to provide the goods or services concerned. This will be explained to you in more detail at the time we collect the personal data and, where appropriate, will be subject to your prior consent.

**If you apply for a position with us**

We may collect personal information in relation to you in connection with any application by you for a position with us. In that case, we will explain in more detail at the time how and for what purposes we intend to process the relevant personal information.

**Where we process your personal data**

We normally process personal data only in the EU.

Where necessary in order to manage our business, we may share relevant personal data with our group companies outside the EU, but only to the extent necessary in order to provide the services concerned.

Where personal data is transferred in relation to providing our services we will take all steps reasonably necessary to ensure that it is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism which may include by entering into EC approved standard contractual clauses relevant to transfers of personal information – see:

[http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index\\_en.html](http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index_en.html)

and that it is treated securely and in accordance with this privacy policy.

**Security of your personal data**

All personal data processed by us is stored securely (the level of security being appropriate to the nature of the data concerned and the other relevant circumstances).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data

transmitted to our website and any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

For more information about your online security during transactions please see our security policy

### **Who we share your personal data with**

We may where appropriate share your personal data with:

- Appropriate third parties including:
- our business partners, customers, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of business with you or the person that you work for;
- our auditors, legal advisors and other professional advisors or service providers;
- credit or other similar reference agencies for the purpose of assessing your suitability or ability where this is in the context of us entering (or proposing to enter) into a contract with you or the person that you work for.
- In relation to information obtained via our website:
- our advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience and subject to the cookie section of this policy;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy.

### **Other disclosures we may make**

We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply and other agreements with you or the person that you work for; or to protect the rights, property, or safety of our business or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, or credit risk reduction.

## The legal basis for our processing of personal data

The legal basis on which we process your personal data is as follows:

- Where it is necessary to obtain your prior consent to processing in order for us to be allowed to do it, we will obtain and rely on your consent in relation to the processing concerned (in relation to any processing we are carrying out with your consent, see below for how to withdraw your consent).

Otherwise, we will process your personal data where the processing is necessary:

- for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract;
- for compliance with a legal obligation to which we are a subject; or
- for the purposes of the legitimate interests pursued by us or another person, provided that this will only be in circumstances in which those legitimate interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data. Usually where we rely on a legitimate interest, it will be our interest in operating and promoting our business.

## How long we keep your personal data

We process personal data only for so long as is necessary for the purpose(s) for which it was originally collected, after which it will be deleted or archived except to the extent that it is necessary for us to continue to process it for the purpose of compliance with legal obligations to which we are subject or for another legitimate and lawful purpose.

## Your rights

You have the following rights in relation to personal data relating to you that we process:

- You may request access to the personal data concerned.
- You may request that incorrect personal data that we are processing be rectified.
- In certain circumstances (normally where it is no longer necessary for us to continue to process it), you may be entitled to request that we erase the personal data concerned.
- Where we are processing your personal data for marketing purposes or otherwise based on our legitimate interests, you may in certain circumstances have a right to object to that processing.
- Where we are processing personal data relating to you on the basis of your prior consent to that processing (such as in relation to marketing by email), you may withdraw your consent, after which we shall stop the processing concerned.

To exercise any of your rights in respect of any of the companies covered by this policy (including withdrawing relevant consents or obtaining access to your personal data), you should **contact us** as set out below.

If you have a complaint about any processing of your personal data being conducted by any of the companies covered by this policy, you can **contact us** or lodge a formal complaint with the **European Data Protection Supervisor**.

## **Contacting the regulator**

The **European Data Collection Supervisor** is the supervisory authority in the EU and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

## **CONTACTING US**

Our contact details are:

Boleythomas House  
Boleythomas  
Creggs  
Co. Galway  
F42 XE10

+353 (0)87 184 6028  
clarriets@gmail.com