

We take data protection and information security very serious. The effective management of all personal data, including security and confidentiality, is the heart of our business and naturally underpins our practices and processes.

This privacy notice informs you about the type, scope and purpose of the processing of personal data we collect, use and process as a part of our website and its functions and content as well as our external online presences, such as our Social Media Profiles (the "Services").

This notice applies to you, the User of our Services and us the provider of the Services and governs the processing of your personal data in context of our Services and business.

This Policy last updated on 6 March 2021.

Name and contact details of the responsible person:

Simply Crates Paul Petty Woodworking Unit 5 Whisby Way Business Park North Hykeham Lincoln, LN6 3LQ Phone: 07960 729554 www.simplycrates.co.uk

As the Controller of your Personal Data, Simply Crates proceeds with all data processing procedures (e.g. collection, processing and transmission) in accordance with the UK's Data Protection Act 2018 and the EU's General Data Protection Regulation 2016/679 (GDPR).



What are the relevant legal bases for processing your data?

In accordance with Art. 13 DSG the following informs you about the legal basis of us processing your data and unless the legal basis is not specifically mentioned, the following applies:

Consent – This is where we have asked you to provide explicit permission to process your data for a particular purpose. (Art. 6 Para. 1 lit. a and Art. 7 DSG)

Contract – This is where we process your information to fulfil a contractual arrangement we have made with you. (Art. 6 Para. 1 lit. b DSG)

Answering your business enquiries – This is where we process your information to reply to your messages, e-mails, posts, calls, etc. (Art. 6 Para. 1 lit. b DSG)

Legitimate Interests - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way. (Art. 6 Para. 1 lit. f DSG). Of course, before relying on any of those legitimate interests we balance them against your interests and make sure they are compelling enough and will not cause any unwarranted harm.

Legal Obligation – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime. (Art. 6 Para. 1 lit. b DSG)

Vital interests – This is where we process your information for communications about security, privacy and performance improvements of our services. Or for establishing, exercising or defending our legal rights. (Art. 6 para. 1 lit. d DSG)

The Supervisory Authority

The Information Commissioner's Office (ICO) in the UK is the for us relevant authority in matters of data protection. You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



Accuracy

It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.

What is personal data?

Personal data refers to any information relating to an identified or identifiable natural person ("Personal Data").

Processing of special categories of data

No special categories data is processed.

Automated decision-making and profiling

We do not use automation for decision-making and profiling.

Children Data

Our website is not intended for children and we do not knowingly collect data relating to children. If you become aware that your Child has provided us with Personal Data, without parental consent, please contact us and we take the necessary steps to remove that information from our server.

Collection, use and storage of personal data

When you use the online offer, Simply Crates collects different data from you, partly also



so-called personal data. This is information that relates to an identified or identifiable natural person (hereinafter "data subject").

Visiting the Simply Crates website in general

When visiting the Simply Crates website, you transmit data to our web server (due to technical necessity) via your internet browser. The following data is recorded during an ongoing connection for communication between your internet browser and our web server: Date and time of the request, Name of the requested file, Page from which the file was requested, Access status (file transferred, file not found, etc.), Web browser and operating system used, complete IP address of the requesting computer, amount of data transferred

For reasons of technical security, in particular to defend against attempted attacks on our web server, this data is stored by us for a short period of time. It is not possible for us to draw conclusions about individual persons on the basis of this data.

The legal basis for the storage is Article 6 lit. f) GDPR.

Further personal information is only collected if you provide it voluntarily, for example in the context of an enquiry or registration. Depending on the area concerned, Simply Crates uses the personal data provided by you to answer your enquiries, to process your order and for the purpose of technical administration of the websites. In detail, the use in the respective areas follows as follows:

When you buy our Crates

When you place an order, we store all data necessary for execution and processing in order to fulfil the contract concluded between you and Simply Crates or to carry out pre-contractual measures in accordance with Article 6 lit. b) GDPR.

This typically includes Your full name, your e-mail address, your address (billing address and, if



applicable, a different delivery address). Your data will only be used to process your order.

Retention of order data

If you submit data to Simply Crates for an order, your data will be stored for as long as necessary for the processing of the purchase and mandatory according to the legal retention periods. The extended storage for the fulfillment of the storage obligations is carried out according to article 6 lit. c) GDPR.

Contacting Us

If you contact Simply Crates via a our contact us page or use any of our online forms, the data you provide will be stored so that your message can be forwarded to the correct contact person. This is done in accordance with Article 6 lit. b) GDPR to process your request. Your data provided via the form will not be used for any other purposes, in particular not for advertising.

Disclosure and deletion of personal data

Visiting the Simply Crates website

The data stored during the mere visit of the Simply Crates website will not be passed on to third parties.

When you buy our Crates

Your personal data will only be passed on to third parties within the scope of the online shop if it is necessary for the purpose of processing the contract, for example, for accounting purposes or for the collection of the payment or to ship your order.



Market Research

All your data collected on the Simply Crates website for the purpose of market research will be used exclusively for Simply Crates internal purposes and will not be passed on to third parties. They will be deleted when their knowledge is no longer necessary for market research.

Transfer to authorities and other public bodies

Your data will only be disclosed to third parties outside the Simply Crates if the responsible public authority or governmental institution orders the disclosure in an individual case, in which case Simply Crates is obliged to do so.

General technical organisational measures

Simply Crates has taken a variety of security measures to protect personal information to an appropriate extent and adequately. All information held by Simply Crates is protected by physical, technical and procedural measures that limit access to the information to specifically authorised persons in accordance with this Privacy Policy.

International transfers

Our main operations are based in the UK and your personal information is generally processed, stored and used within in the UK and other countries in the European Economic Area (EEA). In some instances, your personal information may be processed outside the European Economic Area. If and when this is the case we take steps to ensure there is an appropriate level of security so your personal information is protected in the same way as if it was being used within the UK and the EEA.

Where we need to transfer your data outside in the UK or EEA we will use one of the following safeguards as set out in (Art. 44 ff. GDPR) :

- The use of European Commission approved standard contractual clauses in contracts for the transfer of personal data to third countries.
- Transfers to a non-EEA country with privacy laws that give the same protection as the UK or EEA.



Online presence in social media

We maintain online presences within social media on the basis of our legitimate interests as defined in Art. 6 para. 1 lit. f. GDPR, we maintain online presences within social networks and platforms in order to be able to communicate with the customers, interested parties and users active there and to inform them about our services there. When calling up the respective networks and platforms, the terms and conditions and data processing guidelines of their respective operators apply.

Unless otherwise stated in our data protection declaration, we process the data of users if they communicate with us within the social networks and platforms, e.g. write posts on our online presences or send us messages.

Social Media Widgets

We display sharing buttons (LinkedIn) so you can use social networking to share items from our site. It also includes the recommend buttons and other interactive programs that run on our site that collect your IP address, which page you are visiting on our site, and sets a cookie to enable the widget to function properly. Your interactions with these Widgets are governed by the privacy policy of the company providing them.



Your Rights

You have a number of 'Data Subject Rights' below is some information on what they are and how you can exercise them. There is more information on each right on the Information Commissioners (ICO) website and you can simply follow the links provided to learn more.

- <u>The right to be informed</u>
- The right of access
- <u>The right to rectification</u>
- The right to erasure
- <u>The right to restrict processing</u>
- <u>The right to data portability</u>
- <u>The right to object</u>

Where the processing of your personal information is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, or if we have compelling legitimate interests to keep it. We will let you know if that is the case and will then only use your information for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal information.

We encourage you to get in touch if you have any concerns with how we collect or use your personal information. You do however also have the right to lodge a complaint directly with the ICO, their contact details can be found on their <u>website</u>.



Please direct all requests for information, requests for information or objections to data processing to us.

Changes

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

Contact us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail or by mail using the details provided.