

Privacy policy

Introduction

CumbriaFirst cares about your privacy. For this reason, we collect and use personal data only as it might be needed for us to deliver to you our products, services and websites (collectively, our “Services”). Your personal data includes information such as:

- Name
- Address
- Telephone number
- Email address
- Other data collected that could directly or indirectly identify you.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

If at any time you have questions about our practices or any of your rights described below, you may contact us at privacy@CumbriaFirst.co.uk

What information do we collect?

We collect information so that we can provide the best possible experience when you utilise our Services. Much of what you likely consider personal data is collected directly from you when you:

- (1) create an account or purchase any of our Services (eg: billing information, including name, address, payment details);
- (2) request assistance from our customer support team (eg: phone number, case notes);
- (3) complete contact forms or request newsletters or other information from us (eg: email); or
- (4) participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection may not be as obvious to you, so we wanted to highlight and explain below a bit more about what these might be (as they vary from time to time) and how they work:

Account related information is collected in association with your use of our Services, such as account number, purchases, information requests, Customer support requests and notes or details explaining what you asked for and how we responded.

Cookies and similar technologies on our websites allow us to track your browsing, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services. This allows us to provide you with more relevant product offerings, a better experience on our sites and mobile applications, and to collect, analyse and improve the performance of our Services.

For additional information, and to learn how to manage the technologies we utilise, please visit our [Cookie Policy](#).

Data about Usage of Services is automatically collected when you use and interact with our Services, including metadata, log files, cookie/device IDs and location information. This information includes specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, IP address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.

Supplemented Data may be received about you from other sources, including publicly available databases or third parties from whom we have purchased data, in which case we may combine this data with information we already have about you so that we can update, expand and analyse the accuracy of our records, identify new customers, and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

How we utilise information

We strongly believe in both minimising the data we collect and limiting its use and purpose to only that (1) for which we have been given permission, (2) as necessary to deliver the Services you purchase or interact with, or (3) as we might be required or permitted for legal compliance or other lawful purposes. These uses include:

Delivering, improving, updating and enhancing the Services we provide to you. We collect various information relating to your purchase, use and/or interactions with our Services. We utilise this information to:

- Improve and optimise the operation and performance of our Services (again, including our websites and mobile applications)
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
- Detect and prevent fraud and abuse of our Services and systems
- Collecting aggregate statistics about use of the Services
- Understand and analyse how you use our Services and what products and services are most relevant to you

Often, much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any personal data, but to the extent it is itself personal data, or is linked or linkable to personal data, we treat it accordingly.

Sharing with trusted third parties. We may share your personal data within the CumbriaFirst party, with third parties with which we have partnered to allow you to integrate their services into our own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:

- Processing credit card payments
- Serving advertisements
- Conducting contests or surveys
- Performing analysis of our Services and customers demographics
- Communicating with you, such as by way of email or survey delivery
- Customer relationship management
- Fulfillment Suppliers
- Couriers
- During events with your express permission been given first

We only share your personal data as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from utilising, sharing or retaining your personal data for any purpose other than as they have been specifically contracted for (or without your consent).

Communicating with you. We may contact you directly or through a third party service provider regarding products or services you have signed up to or purchased from us, such as necessary to deliver transactional or service related communications. We may also contact you with offers for additional services we think you'll find valuable if you give us consent, or where allowed based upon legitimate interests. You don't need to provide consent as a condition to purchase our goods or services. These contacts may include:

- Email
- Text (SMS) messages
- Telephone calls
- Push Notification

Compliance with legal, regulatory and law enforcement requests. We will share your information to the extent necessary to provide our service to you such as supply of

products ordered. This may include providing your information to suppliers and couriers.

We will never share your information with any third-party outside or the delivery chain and business that form Part of our group without your express consent unless legally required to do so.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

Website analytics. We use multiple web analytics tools provided by service partners such as Google Analytics to collect information about how you interact with our website or mobile applications, including what pages you visit, what site you visited prior to visiting our website, how much time you spend on each page, what operating system and web browser you use and network and IP information. We use the information provided by these tools to improve our Services to you. These tools place cookies in your browser to identify you as a unique user the next time you visit our website. Each cookie cannot be used by anyone other than the service provider (eg: Google for Google Analytics and FaceBook). The information collected from the cookie may be transmitted to and stored by these service partners on servers in a country other than the country

in which you reside. Though information collected does not include personal data such as name, address, billing information, etc., the information collected is used and shared by these service providers in accordance with their individual privacy policies. You can control the technologies we use by managing your settings through our [Cookie Policy](#) or the ‘cookie banners’ that may be presented when you first visit our webpages, or by utilising settings in your browser.

Targeted advertisements. Targeted ads or interest-based offers may be presented to you based on your activities on our webpages, and other websites, and based on the products you currently own. These offers will display as varying product banners presented to you while browsing. We also partner with third parties to manage our advertising on our webpages and other websites such as Facebook, Twitter, Google and Microsoft. Our third party partners may use technologies such as cookies to gather information about such activities in order to provide you with advertising based upon your browsing activities and interests, and to measure advertising effectiveness. If you wish to opt out of interest-based advertising in the European Union click [here](#). Please note you will continue to receive generic ads.

Third-party websites. Our website and our mobile applications may contain links to third-party websites. We are not responsible for the privacy practices or the content of third-

party sites. Please read the privacy policy of any website you visit.

How you can access, update or delete your data

To easily access, view, update, or to update your subscription preferences or to delete or port your personal data (where available) please contact us via one of the communications methods listed at the end of this policy statement.

If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honoured only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

you may also contact us by one of the methods described in the “Contact Us” section below.

How we secure, store and retain your data

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and

once received and stored, including utilisation of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact us at privacy@CumbriaFirst.co.uk

‘Do Not Track’ notifications

Some browsers allow you to automatically notify websites you visit not to track you using a “Do Not Track” signal. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you may wish to visit www.allaboutdnt.com.

Age restrictions

Our Services are available for purchase only for those over the age of 16. Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 16. If you know of or have reason to believe anyone under the age of 16 has provided us with any personal data, please contact us.

Changes in our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Data Protection Authority

Jonathan Davies is the data controller for CumbriaFirst and is registered on the Information Commissioner's Office's Register of Data Controllers under number [ZA106519](#). You may direct questions or complaints in respect of how we handle your Personal Data to the Information Commissioner's Office.

www.ico.org.uk

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: 0303 123 1113

Contact us

If you have any questions, concerns or complaints about our Privacy Policy, our practices or our Services, you may contact us by email at privacy@CumbriaFirst.co.uk alternatively, you may contact us by either of the following means:

- **By Mail:** Attn: GDPR, CumbriaFirst The Office Mile Lane Nurseries, Mile Lane, Penrith, Cumbria CA11 0BX
- **By Phone:** 01768 800220

We must respond to all personal information "GDPR" requests, inquiries or concerns within 30 days.