

## Privacy Policy

### BACKGROUND:

This Policy applies to our use of any and all Data collected by us in relation to your use of the Web Site and any Services or Systems therein.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account” means collectively the personal information, Payment Information and credentials used by Users to access Material and / or any communications System on the Web Site;

“Content” means any text, graphics, images, audio, video, software, data compilations and any other form of information capable of being stored in a computer that appears on or forms part of this Web Site;

“Cookie” means a small text file placed on your computer by Gray Nicolls when you visit certain parts of this Web Site. This allows us to identify recurring visitors and to analyse their browsing habits within the Web Site.

“Data” means collectively all information that you submit to the Web Site. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;

“Service” means collectively any online facilities, tools, services or information that Gray Nicolls makes available through the Web Site either now or in the future;

“System” means any online communications infrastructure that Gray Nicolls makes available through the Web Site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links;

“User” / “Users” means any third party that accesses the Web Site and is not employed by Gray Nicolls and acting in the course of their employment; and

“Web Site” means the website that you are currently using and any sub-domains of this site unless expressly excluded by their own terms and conditions.

### 2. Data Collected

Without limitation, any of the following Data may be collected:

2.1 name;

2.2 date of birth;

2.3 gender;

2.4 job title;

2.5 profession;

2.6 contact information such as email addresses and telephone numbers;

2.7 demographic information such as post code, preferences and interests;

2.8 financial information such as credit / debit card numbers;

2.9 IP address (automatically collected);

2.10 web browser type and version (automatically collected);

2.11 operating system (automatically collected);

2.12 a list of URLs starting with a referring site, your activity on this Web Site, and the site you exit to (automatically collected); and

2.13 Cookie information (see clause 10 below).

### 3. Our Use of Data

3.1 Any personal Data you submit will be retained by Gray Nicolls for as long as you use the Services and Systems provided on the Web Site. Data that you may submit through any communications System that we may provide may be retained for a longer period of up to 1 year.

3.2 Unless we are obliged or permitted by law to do so, and subject to Clause 4, your Data will not be disclosed to third parties.

3.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security, see clause 9 below.

3.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Web Site. Specifically, Data may be used by us for the following reasons:

3.4.1 internal record keeping;

3.4.2 improvement of our products / services;

3.4.3 transmission by email of promotional materials that may be of interest to you;

3.4.4 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Web Site.

4. Third Party Web Sites and Services Gray Nicolls may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to certain personal Data provided by Users of this Web Site. Any Data used by such parties is used only to the extent required by them to perform the services that Gray Nicolls requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties must be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

5. Changes of Business Ownership and Control

5.1 Gray Nicolls may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

5.2 In the event that any Data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.

6. Controlling Access to your Data

6.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

6.1.1 use of Data for direct marketing purposes; and

6.1.2 sharing Data with third parties.

7. Your Right to Withhold Information

7.1 You may access certain areas of the Web Site without providing any Data at all.

However, to use all Services and Systems available on the Web Site you may be required to submit Account information or other Data.

7.2 You may restrict your internet browser's use of Cookies. For more information see clause 10.4 below.

8. Accessing your own Data

8.1 You may access your Account at any time to view or amend the Data. You may need to modify or update your Data if your circumstances change.

Additional Data as to your marketing preferences may also be stored and you may change this at any time.

8.2 You have the right to ask for a copy of your personal Data on payment of a small fee.

9. Security

9.1 Data security is of great importance to Gray Nicolls and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected online.

10. Cookies

10.1 Gray Nicolls may set and access Cookies on your computer. Cookies that may be placed on your computer are detailed in Schedule 1 to this Policy.

10.2 A Cookie is a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the web site that placed it there, not any other sites.

10.3 You may delete Cookies, however you may lose any information that enables you to access the Web Site more quickly.

10.4 You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of Services available on the Web Site.

#### 11. Changes to this Policy

Gray Nicolls reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Web Site and you are deemed to have accepted the terms of the Policy on your first use of the Web Site following the alterations.