



BY APPOINTMENT TO
HER MAJESTY THE QUEEN
SHORTBREAD & OATCAKE MANUFACTURER
WALKERS SHORTBREAD LTD, ABERLOUR

CUSTOMER PRIVACY POLICY

Walkers Shortbread Limited ("**Walkers Shortbread**", "**we**" or "**us**") respects the privacy of every individual who visits our Website (as defined below) and is committed to protecting and respecting your personal data.

This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It applies when you visit our website at www.walkersshortbread.com/uk/ ("**Website**") regardless of where you visit it from and provides you with information about:

- how we use your data;
- how we look after your personal data; and
- your legal rights relating to your personal data.

This privacy policy is provided in layered format so that you can click through to the specific areas set out below.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy (together with our [terms of use](#) and any other documents referred to in it) provides information on how we collect and process your personal data through your use of our Website, including any personal data you may provide when you sign up to our newsletter, purchase any of our products, take part in any competitions or when you contact us over our Website.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide to you on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements the other policies and is not intended to override them.

Our Website is not intended for children and we do not knowingly collect personal data relating to children.

DATA CONTROLLER

Walkers Shortbread Limited, registered in Scotland (company registration SC063233) is the data controller and is responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our DPO using the details set out below.

CONTACT INFORMATION

Name or title of: Data Protection Officer

Email address: enquiries@walkers-shortbread.co.uk

Postal address: Walkers Shortbread Limited, Aberlour House, Aberlour, Banffshire, AB38 9LD

Telephone number: +44 (0)1340 871555

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 18 June 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data means details which identify you or could be used to identify you such as your name and contact details. It does not include data where the identity of a person has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, title and date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone number.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
- **Profile Data** includes your e-mail address and password, purchases made by you, your preferences and survey responses.
- **Usage Data** includes information about how you use our Website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods). In this case, we may have to cancel an order you have made with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Transaction and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - fill in registration forms to register for an account;
 - make use of our Website and services, such as, searching for a product and placing an order;
 - sign up to receive emails and updates via post, for example, newsletters or promotional information;
 - participate in social media functions which may be available on our Website;
 - participate in competitions, promotions or surveys; or
 - contact or correspond with us by phone, email or otherwise.

- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties.** We may receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - Analytics providers such as Google based outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

- where we need to perform the contract we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or post. You have the right to withdraw consent to marketing at any time by contacting us.

You can find out more about these legal bases here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/#ib3>.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

- (i) **Contractual Obligations.** We may process your personal data to carry out our obligations arising from any contracts entered into between you and us (or proposed to be entered into) and to provide you with the information, products and services that you request from us. Legal basis: such processing is necessary for the performance of a contract we have entered or are about to enter with you.
- (ii) **Order process and delivery.** We may process your personal data to process and deliver your order including manage payments, fees and charges, and to collect and recover money owed by you to us. Legal basis: such processing is necessary for the performance of a contract with you and/or for our legitimate interests (to recover debts due to us).
- (iii) **Relationship management.** We may process your personal data to manage our relationship with you which will include: notifying you about any material changes to our terms or privacy policy and/or asking you to leave a review or take a survey. Legal basis: such processing is necessary for the performance of a contract with you, to comply with a legal obligation and/or for our legitimate interests (to keep our records updated and to study how customers use our products/services).
- (iv) **Promotions.** We may process your personal data to enable you to partake in a prize draw, competition or complete a survey. Legal basis: such processing is necessary for the performance of a contract with you and/or for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
- (v) **Business requirements.** We may process your personal data in order to administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). Legal basis: such processing is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) and/ or to comply with a legal obligation.
- (vi) **Advertising.** We may process your personal data to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. Legal basis: such processing is necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
- (vii) **Data analytics.** We may process your personal data for data analytics purposes in order to improve our Website, products and services, marketing and/or customer relationships and experiences. Legal basis: such processing is necessary for our legitimate interests (to define the types of customers for

our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy).

- (viii) **Recommendations about our products.** We may process your personal data to make suggestions and recommendations to you about our products that may be of interest to you. Legal basis: such processing is necessary for our legitimate interests (to develop our products and services and to grow our business).

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a preference centre where you can view and make certain decisions about your personal data use (requires you to log-in via website to access).

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the Walkers Shortbread group of companies for marketing purposes.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by logging into your account online at www.walkersshortbread.com/uk/ ("**Website**") and requesting to update your preferences. This will send an email to your inbox where you can access your preference centre to check or uncheck relevant boxes to adjust your marketing preferences. You can also opt-out by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal

data provided to us as a result of an order for goods or other transactions.

COOKIES

Our Website uses cookies to provide a better service to its users and to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website site may become inaccessible or not function properly. For detailed information on the cookies we use and the purposes for which we use them see our [cookie policy](#).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the following third parties for the purposes set out in in paragraph 4 above:

- analytics and search engine providers that assist us in the improvement and optimisation of our Website.
- business partners, suppliers and sub-contractors that provide us with hosting, payment, distribution and IT services.
- Professional advisers acting as processors or joint controllers including lawyers and auditors based in the United Kingdom who provide auditing services and legal services.

- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- HMRC, regulators and other authorities who require reporting of processing activities in certain circumstances.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area.

7. DATA SECURITY

All personal data you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Where you have chosen a password which enables you to access certain parts of our Website, we ask you not to share your password with anyone.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being a customer for tax purposes.

In some circumstances you can ask us to delete your personal data: see [request erasure of your personal data](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data including a right to:

- request access to your personal data.
- request correction of your personal data.
- request erasure of your personal data.
- object to processing of your personal data.
- request restriction of processing your personal data.
- request transfer of your personal data.
- right to withdraw consent.

You can find out more about your rights here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you wish to exercise any of the rights set out above, please contact us by email at enquiries@walkers-shortbread.co.uk.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee or alternatively refuse to comply with your request, if your request is clearly unfounded, repetitive or excessive.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.