

INTERVINO PRIVACY POLICY

1. INTRODUCTION

We are Intervino Ltd, a company registered in England and Wales with company no. 05659462 and registered address at Lencraft Distribution Centre, Manby Road, Louth, Lincolnshire, LN11 8HB (“**Intervino**”, “**we**”, “**our**”, “**us**”). For the purposes of data protection law, our relationship to you is as follows:

- (a) If you are an individual customer or an employee of one of our corporate clients, we will be a controller of the personal information we hold about you. This means we make decisions about how and why your information is used, and have a legal duty to make sure that your rights are protected when we do so.
- (b) If you have received one of our products e.g. a corporate gift or hamper which one of our clients has instructed us to send to you, we will be a data processor of your information. This means that we can only use it in ways which our client has authorised e.g. putting together the package, personalising it and sending it to you by post.

This policy explains what personal information we collect when you visit www.intervino.co.uk (our “**Website**”), when your employer enters into a contract with us, or when we obtain your details from one of our clients.

If you have any questions about our Privacy Policy, please contact us by writing to us at our registered address given above, telephoning us on 01507 602101 or contacting us using the details given on our [Contact Us](#) page.

2. THE INFORMATION WE COLLECT

We collect personal information about you in several ways, as discussed below:

The Information You Give Us

If you contact us to enquire about a campaign, to discuss your requirements or for any other reason, we will keep a record of that correspondence.

If you purchase one of our products via our online shop or any other outlet e.g. Amazon, we will need to collect personal information from you in order to fulfil your order. This may include your name, address, payment information and contact details. If you order a gift to be sent to another person, we will also need to process their information so that we can send them your order.

Information arising from the work we do for you/your employer

If you are a business customer and we enter into a contract with your employer, we will retain the name and contact details of the personnel we will be working with, in order to be able to carry out the work we have agreed to do.

Information sent to us by corporate clients

If you have received a package that we have personalised, our client will have sent certain details about you to us in order to allow us to do so. These details will be limited to your name and address.

Sensitive personal information

We will not typically collect information that is particularly sensitive - that is, information relating to your race or ethnic origin, political opinion, religious or other similar beliefs, trade union membership, physical or mental health, sexual orientation or criminal records.

Technical data

When you visit our Website, we may collect technical data about the device you are using, including where available your IP address, operating system and browser type. This is used for system administration and to improve the look and feel of our website. See section 3 for more about the technical data we collect through cookies.

3. USE OF COOKIES

Cookies are small pieces of information that are stored on your browser on the hard-drive of your device.

We use the following types of cookies:

- (a) Strictly necessary cookies. These are cookies that are required for the operation of our Website.
- (b) Analytical/performance cookies. These cookies allow us to recognise and count the number of visitors and to see how visitors move around our Website. This helps us to improve the way the Website works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Third-Party Cookies. We use certain third-party cookies which are placed on your device by other websites. These cookies are placed by Google Analytics, and their function is discussed further below.

Google Analytics

Our Website uses Google Analytics for internal analysis of visitor behaviour and trends, to evaluate traffic flow (e.g. busiest times of day/week) and to assess the relative popularity of different parts of our Website. We use the information we collect to monitor the number of visitors to the different sections of our Website, and to help us make it more useful to visitors. We do not share individual data or track user behaviour after you have left our Website.

Any information collected will be used in accordance with our own privacy policy and Google's privacy policy.

If you do not wish to participate, you can:

- (a) opt out of Google's use of cookies through Google's Ads Settings; or
- (b) refuse the use of cookies by downloading and installing the Google Analytics Opt-out Browser Add-on.

4. OTHER SITES

Our Website may contain links to other sites. These are outside of our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you, which will be used by them in accordance with their own privacy policies, which may differ from ours.

5. HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use it in the following circumstances:

- (a) where we need to perform a contract e.g. when you or your employer contracts us to fulfil personalised orders for the business;;
- (b) 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 (see the "Legitimate Interests" section below); or
- (c) where we need to comply with a legal or regulatory obligation.

We do not sell, rent or trade your personal information to any third party for marketing purposes.

We may use personal information held about you in the following ways:

- if we are contracted to provide services, to communicate with you about them;
- if you are the recipient of one of our packages, to allow us to send it to you; and
- to deal with your enquiries, comments or requests.

6. LEGITIMATE INTERESTS

We may rely on legitimate interests to process your personal information, provided that your interests do not override our own.

Where we rely on legitimate interests, these interests are:

- (a) to keep our records updated and to study how our Website and other services are used;
- (b) to administer and protect our business and web presence (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting);
- (c) to inform our marketing strategies; and
- (d) to grow our business.

7. KEEPING YOUR PERSONAL INFORMATION SAFE

We employ a variety of physical and technical measures to keep your personal information safe and to prevent unauthorised access to, use or disclosure of it. We control who has access to your information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which they are required to follow when handling personal information.

8. STORAGE AND RETENTION

We typically store your personal information on servers located within the European Economic Area (“EEA”). However, if we need to transfer it outside of the EEA, We will take all steps reasonably necessary to ensure that any personal data transferred is treated securely and in accordance with applicable data protection laws.

How long we keep it

We collect and store personal information for purposes connected with our business. As such, we will only retain your personal information for as long as necessary for those purposes.

If a client has passed us your personal information in connection with a personalised delivery, we will only retain this for 6 months following the campaign. We will retain all other personal information for a period of 6 years, for tax and legal reasons.

9. DISCLOSING YOUR PERSONAL INFORMATION

Except for as described in section 10 below, we will not disclose your personal information to a third party without your consent.

10. DISCLOSURES REQUIRED BY LAW

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

We also may need to retain and disclose certain personal information about you to regulatory authorities and to appropriate agencies to conduct anti-money laundering and trade sanction checks, or to assist with fraud prevention. We will disclose this information as is required by law.

11. ACCESS TO YOUR PERSONAL INFORMATION

We want you to remain in control of your personal information. Part of this is making sure you understand your legal rights, which are as follows:

- (a) where your personal information is processed on the basis of consent, the right to withdraw that consent;
- (b) the right to confirmation as to whether or not we are holding any of your personal information and, if we are, to obtain a copy of it;

- (c) the right to have certain data provided to you in a portable electronic format (where technically feasible);
- (d) the right to have inaccurate personal information rectified;
- (e) the right to object to your personal information being used for marketing or profiling, or on the basis of our or a third party's legitimate interests;
- (f) the right to restrict how your personal information is used; and
- (g) the right to be forgotten, which allows you to have your personal information erased in certain circumstances (though this is not an absolute right and may not apply if we need to continue using it for a lawful reason).

If you would like further information about any of your rights or wish to exercise them, please contact us using the details given in section [Error! Reference source not found,](#)

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so (for example, because the information no longer exists or there is an exception which applies to your request).

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at www.ico.org.uk.

12. UPDATING THIS POLICY

We may update this Policy at any time. When we do, we will post a notification on the main page of our Website and we will also revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we hold.

This policy was last updated on [*Insert date*] 2018