



Data Privacy Policy

1. About this Policy

- 1.1. This policy explains when and why we collect personal information (such as about our employees, customers and suppliers), how we use it, how we keep it secure and your rights in relation to that personal information.
- 1.2. We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3. We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website www.largschandlers.co.uk regularly for any amendments (but amendments will not be made retrospectively).
- 1.4. We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

- 2.1. We are Largs Chandlers Ltd. We can be contacted at:

shop@largschandlers.co.uk

01475 686026

Largs Chandlers Ltd, Largs Yacht Haven,
Irvine road, Largs, KA308EZ

3. What information we collect and why.

3.1. Customers

3.1.1. In store

Type of information	Purposes	Legal Basis of Processing
Records of Transactions <i>Transaction records will not</i>	Maintaining basic financial records as required for business management and	Legal obligation Legitimate Interests in operating our business

<i>generally contain personally identifiable information but may do so when combined with CCTV time stamp or Card Payment Data.</i>	compliance with VAT and other regulations.	Performance of a contract
CCTV	Prevention of Crime	Legitimate Interests in operating our business
Card Payment Data (please see 4.2.2)	Taking payments	Performing our contract with the customer
Largs Sailing Club Discount Card List <i>Includes name, phone number, boat name and membership type</i>	Largs SC provides a list of members eligible for discount to enable verification and pre-loading discount for accounts	Consent – Largs SC obtain consent from members to provide the data.

3.1.1.1. Customer Accounts

We offer accounts to our regular customers

Type of information	Purposes	Legal Basis of Processing
Customer's name, preferred title/pronoun, gender, address, telephone numbers, e-mail address(es).	Managing the customer's relationship with us, and the provision of the service.	Legal obligation Performing our contract with the customer Legitimate Interests in operating our business
Records of Transactions	Managing the customer's relationship with us, and the provision of the service.	Performing our contract with the customer Legal obligation Legitimate Interests in operating our business
Financial information such as bank details and Card Payment Data (please see 4.2.2)	Taking Payments	Performing our contract with the customer

3.2. Suppliers

Type of information	Purposes	Legal Basis of Processing
Suppliers name, names of those working for the supplier, address, telephone numbers, e-mail address(es).	Managing the supplier's relationship with us, and the provision of the service.	Performing our contract with the Supplier Legitimate Interests in operating our business
Records of Transactions	Managing the supplier's relationship with us, and the provision of the service.	Legal obligation Legitimate Interests in operating our business

Financial information such as bank details	Making Payments	Performing our contract with the Supplier
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3.3. Employees

Type of information	Purposes	Legal Basis of Processing
Employee name, Gender, address, telephone numbers, e-mail address(es).	Managing the employee's relationship with us.	Performing our contract with the employee Legitimate Interests in operating our business Legal obligation
Work history; including times and dates worked, disability, pregnancy, sickness and other related information	Managing the employee's relationship with us.	Legal obligation Legitimate Interests in operating our business
Financial information such as bank details	Making Payments	Performing our contract with the employee

3.4. Online

Our website stores limited user information (logging) for security and analytical purposes to enable the service to be provided. The website service provider is WIX whose data protection policy covers this usage. The provider makes provision for rights of access and to be forgotten.

4. How we protect your personal data

4.1. We will not transfer your personal data outside the EU without your consent.

4.2. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.2.1. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.2.2. We do not retain any Card Payment Data in our systems

All card payment data is encrypted within the Pin Entry Device (provided and secured by the Card Payment Processor) before being transmitted to our Card Payment Processor.

4.3. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in paragraph 5.2 below.

5.2. We may pass your personal data to third parties who are service providers, agents or subcontractors to us; either providing systems or services essential to the running of our

business (such as Payment Services or technical support) or for the purposes of providing services to you on our behalf (such as using a delivery service or engaging someone to install something on your boat).

5.2.1. We do this for the purpose of our legitimate interests in operating the business and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

5.2.2. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

6. How long do we keep your information

6.1. We will hold your personal data on our systems for as long as you are a customer of the business and for as long afterwards as it is in the businesses legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2. We securely destroy all financial information once we have used it and no longer need it

7. Your rights

7.1. You have rights under the GDPR:

7.1.1. to access your personal data

7.1.2. to be provided with information about how your personal data is processed

7.1.3. to have your personal data corrected

7.1.4. to have your personal data erased in certain circumstances

7.1.5. to object to or restrict how your personal data is processed

7.1.6. to have your personal data transferred to yourself or to another business in certain circumstances.

7.2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow
Cheshire
SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to Jane Ashdown – shop@largschandlers.co.uk or the above postal address.