



Corking Digital Ltd - Privacy Policy

This statement tells you about the data processing practices of Corking Digital. We collect and retain only relevant personal data about you which is used exclusively for our the purposes of conducting our business. This policy applies to personal data we collect through our website and also to any other personal data we collect or receive through any other medium, such as social media. We do not share your information with any external third parties unless you have expressly given us permission to do so. We are very mindful of the sensitivity of your personal data and we have taken all reasonable steps to ensure that your information is: accurate and up-to-date, not excessive, properly protected and held in the strictest confidence. If you wish your details to be removed from our database, or to update any of your details (or for any other reason outlined in Section 6 below) please contact us using the details as set out in Section 14 below.

Corking Digital understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits www.corking.digital ("Our Site"), and who provides us with their personal data in whatever form and through whatever other medium. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

This Privacy Policy applies to (1) your use of Our Site and social media accounts, (2) all third party services that we work with and operate for the purposes of handling data; (3) any personal data that you supply to us through any other medium.

DEFINITIONS AND INTERPRETATION

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

- Personal Data

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

- Corking Digital/Corking.Digital/We/Us/Our

means Corking Digital Ltd, a company registered in England under company number 12510099, whose registered address is 41 Poppyfields, Welwyn Garden City, Hertfordshire, United Kingdom, AL7 2HJ

WHAT DOES THIS POLICY COVER?

This Privacy Policy applies (1) your use of Our Site and our social media services, (2) all third party services that we work with and operate for the purposes of handling data; (3) any personal data that you supply to us through any other medium. Our Site, and communications sent out by any of the third party services that we use for marketing purposes may contain links to other websites. Please note that we have no control over how your personal data is collected, stored, or used by other websites linked to from our website or other services and we advise you to check the privacy policies of any such websites before providing any personal data to them.

YOUR RIGHTS



As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you (see section 12);
- The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you.

WHAT DATA DO WE COLLECT?

1. on Our Site: Depending upon your use of Our Site, We may collect some or all of the following personal, and non-personal data (please also see section 13 on Our use of Cookies and similar technologies):

- Name
- Contact information such as
- IP address
- Web browser type and version
- Operating System

2. Through any other medium:

- Name
- Contact information such as postal addresses, email addresses and telephone numbers
- Supplier and Customer data (bank account details, address, contact information).

HOW DO WE USE YOUR DATA?

1. All personal data is processed and stored securely, for no longer than is necessary in light of the reasons for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.



- a. Email Retention
 - i. All email sent to or from corking.digital email accounts is automatically archived. The archive retention period is 72 months.
 - ii. All email sent to or from corking.digital email accounts is retained (unless manually deleted) for 36 months, in Outlook. After 36 months, emails are automatically deleted from Outlook (note, they are still available in the archive for a further 36 months).
- b. Database Retention
 - i. The accuracy of your personal data shall be checked when it is collected and at the intervals as set out below thereafter. Each record has a “last verified date” and an accuracy policy class (from A to E). A to E represent months (A 12, B 24, C 36, D 60, E 120). If the current day’s date less last verified date is greater than the accuracy policy class, the record is flagged for review. If any of your personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.
 - c. We shall not keep your personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held and processed. Factors to consider include whether the type of event or process the data was held for still takes place, whether the primary data associated with you is still relevant (for example, fax numbers).
 - d. When your personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
2. Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - a. Emails – Replying to emails from you
 - b. Influencer contact info – Follow-up, invitations to events, sample delivery
 - c. Event Attendee contact info – Act as guest list for event, send details prior to event and follow up after event
 - d. Photos Event publicity and archiving
3. With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, and/or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
4. Third parties (including Instagram) whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
5. If Our data processing is based on your consent. You have the right to withdraw your consent to Us using your personal data at any time, and to request that we delete it.



The accuracy and relevance of personal data shall be checked periodically, the period depending on the sensitivity of the data.

HOW AND WHERE DO WE STORE YOUR DATA?

We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

Your data will only be stored in the EEA.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site and from any other sources.

DO WE SHARE YOUR DATA?

We will not share any of your data with any third parties for any purposes, except when you give us your express permission (for example, when requesting delivery of a wine sample). However, for the fulfilment of certain tasks (such as organising events) we use the services of data processors with whom we have data processing agreements compliant with the GDPR. In accordance with these agreements any data processor processes your personal data only on documented instructions from Us; ensures that persons authorised to process your personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.

We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority. In these instances, our compliance with the law overrides your privacy rights.

WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

1. We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

2. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

HOW CAN YOU CONTROL YOUR DATA?

1. In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site or via other means, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited



marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

YOUR RIGHT TO WITHHOLD INFORMATION

1. You may access certain areas of Our Site without providing any personal data at all, or without us collecting any data. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
2. You may restrict Our use of Cookies. For more information, see section 13.

HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at hello@corking.digital or using the contact details below in section 14.

OUR USE OF COOKIES

1. Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
2. By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for For showing social feeds. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
3. All Cookies used by and on Our Site are used in accordance with current Cookie Law.
4. Before certain Cookies are placed on your computer or device, you will be shown a notification requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

CONTACTING US

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at hello@corking.digital. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

CHANGES TO OUR PRIVACY POLICY



We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.