

New Hall Wine Estate - GDPR Statement – updated June 2022

New Hall Wine Estate (the "Company") is a member of The Greenwood Partnership group of companies (the "Group"). This GDPR Statement explains how we use any personal information we collect about you.

The Company is a data controller in respect of the personal data we collect about you for purposes of the General Data Protection Regulation (EU Regulation 2016/679) as it forms part of the laws of England and Wales and of Scotland ("GDPR") and the UK Data Protection Act 2018 ("DPA") and any other data protection legislation which supplements the GDPR and DPA in the United Kingdom in the future.

WHAT INFORMATION DO WE COLLECT FROM YOU?

Some of the information we collect is classified as "personal data" under the GDPR as it is information relating to an individual such as a sole trader, a partnership, a company director, a beneficial owner, a trustee, a professional contact etc.

We collect personal information which you provide when you complete an account application form or our online registration form, if you make an online purchase or if you provide us with your personal details by email, telephone or any other means of communication.

The Company may collect and process the following types of personal data which you provide in connection with the services:

- Your name and sometimes your signature;
- Your date of birth;
- Your contact details such as your residential address, email and telephone number;
- Your bank details and /or your card payment details;
- Copies of documents you provide to prove your age or identity (including your passport and driver's license). This will include details of your facial image, and if your passport it will include your place of birth, gender and nationality;
- Your IP address, location data, cookie & social identifiers (including for example gender and age range) and when you visit our website, the URL's of the webpages you have reviewed;
- Your Social media username, if you interact with us through those channels to help us respond to your comments, questions or feedback;

WHAT INFORMATION DO WE COLLECT ABOUT YOU FROM THIRD PARTIES AND PUBLIC SOURCES?

The Company may collect personal data about you from third parties or public sources. The personal data about you collected from such third parties and public sources includes the following information: Your name, your job title, your contact phone number, your email address, your residential address and address links to your name, fraud prevention information, public record information.

Your name and contact details may be collected from Companies House if you are a Director of a business we deal with. Before the Company approves payment terms, the Company will undertake

credit and identity checks using an external credit reference agency and the Company will receive personal data relating to you in response to such a check.

WHAT IS THE PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR INFORMATION?

The purposes for which we may process all of the above personal data - and the legal basis on which we perform such processing - are:

Communicating with you in relation to products or services that we provide you - we have a legitimate interest in communicating with you in relation to the products or services that we provide you.

Communicating and interacting with you via our websites - we have a legitimate interest in communicating and interacting with you via our websites.

Targeted marketing to increase sales where you have provided personal data in the course of a sale or negotiation for a sale, where the messages we send are only marketing similar products or services and where you gave consent to receive marketing or you subscribed to our newsletter mailing list - we have a legitimate interest in promoting our business to specific individuals in order to increase sales. We have obtained your consent to contact you about wines, wine services and events.

Networking and promoting business growth - we have a legitimate interest in expanding our network of suppliers, customers and partners in order to expand our business.

Establishing, exercising and defending our legal rights, such as debt enforcement via employment of a debt collector - we have a legitimate interest in establishing, exercising and defending our legal rights.

For audit, compliance, controls and other risk management - we have a legitimate interest in establishing, exercising and defending our legal rights.

For business management including manual data and record management- we have a legitimate interest in ensuring the accuracy of the data held and processed by the Company.

Identifying issues with our existing services; planning improvements to existing services; and creating new services - we have a legitimate interest in identifying issues with our existing services; planning improvements to existing services; and creating new services.

Processing your orders, managing your account and otherwise complying with our contractual obligations - it is necessary to process the personal data for the performance of a contract to which you are a party. It is necessary for you to provide the personal data in order for us to perform the contract and failure to provide such necessary personal data may preclude our ability to perform our obligations under the contract.

Determining the risk of conducting business with you by running ID and / or credit search both at present and at any future date - we have a legitimate interest in legal and regulatory compliance.

Complying with our legal, regulatory and reporting requirements to regulatory bodies, such as HM Revenue & Customs - it is necessary to process the personal data in order to comply with our legal obligations. It is necessary for us to collect the personal data in order to use it for this purpose to comply with our statutory legal obligations and your failure to provide such necessary personal data may preclude our ability to continue our relationship with you.

You can object to the use of your personal data at any time, but this may restrict the services we can continue to offer you.

WHO WILL YOU SHARE MY PERSONAL DATA WITH?

We may disclose your personal information to service providers who process data on our behalf in the course of providing services to the Company, including:

- Warehousing and delivery services who may contact you regarding the status of your delivery;
- Direct marketing companies and mailing houses who help us manage our electronic and mailed communications;
- IT companies who support our website and other business systems;
- Banks and payment processors;
- Identification verification services to prevent or detect crime in compliance with current regulations;
- Third party debt collection agencies.

In some contexts, we may disclose the personal data to the following third parties:

- the Company's legal adviser for the purposes of providing legal advice to the Company;
- the Company's auditor for the purpose of providing audit services to the Company;
- HM Revenue & Customs and other regulatory bodies if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

HOW LONG WILL YOU RETAIN AND STORE MY DATA FOR?

Personal data is stored for varying lengths of time depending on the nature and purpose for which it was collected. To determine the appropriate retention period for your data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and whether we can achieve the purpose of the processing through other means. Our retention of your personal data - and the criteria we apply to determine how long it is necessary for us to retain your personal data - is kept under review. In any case personal data will be retained for only as long as is necessary for the purpose for which it was collected subject to any statutory minimum periods. For further information about this, please contact us at newhall@newhallwines.co.uk.

WHAT ARE MY RIGHTS?

In certain circumstances, under the GDPR, you will have the right to:

- request access to your personal data;
- request rectification of your personal data if it is inaccurate or incomplete;
- restrict the processing of your personal data (for example, if you want the Company to establish its accuracy or the reason for processing it);
- object to your personal data being processed;
- lodge a complaint with a supervisory authority (e.g. the Information Commissioner's Office in the UK by contacting them at <https://ico.org.uk/concerns/> or by post at Wycliffe House, Water Lane, Wilmslow SK9 5AF);
- withdraw your consent to the processing, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Company have received notification that you have withdrawn your consent, they will no longer process your information for the purpose or purposes you originally agreed to, unless they have another

legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before it's withdrawal.

CONTACT US

If you would like to contact us to access, rectify or request deletion of your personal data, object to the processing of your personal data, withdraw your consent to processing or make a complaint (if applicable), please contact the Company in writing by emailing us at

newhall@newhallwines.co.uk

or to the following address:

New Hall Wine Estate, Chelmsford Road, Purleigh, Essex CM3 6PN

MARKETING AND COMMUNICATION

You can unsubscribe or amend your preferences on how we communicate with you at any time using the following methods:

Email us directly at newhall@newhallwines.co.uk

Phone us on + 44 (0)1621 828 343

You can also unsubscribe from email communications by clicking the unsubscribe link at the foot of the email.

UPDATES TO THIS STATEMENT

The Company reserves the right to update this Notice and any other relevant policies or procedures at any time.