

Privacy Policy

NOTE: PLEASE NOTE THAT BY REGISTERING WITH US OR USING OUR WEBSITE YOU ARE DEEMED TO HAVE READ AND ACCEPTED THIS PRIVACY POLICY.

In this privacy policy, Christopher Cooper, us and our shall refer to the London based consultancy and media content providing business of Christopher Cooper.

What this Privacy Policy does

1. This Privacy Policy describes how we collect and use information relating to you, from which you can be identified (known as “Personal Data”). It should be read in conjunction with our Terms of Service and other terms and conditions that you are asked to sign up to when you use our services (“Services”), since these may contain additional information regarding how we use your Personal Data.
2. We take your privacy seriously. In particular, we are committed to ensuring that your Personal Data is protected in accordance with our legal obligations under the Data Protection Directive 95/46 (as amended) and national data protection laws.
3. Should you provide us with Personal Data, this will only be used in accordance with this Privacy Policy and such other terms and conditions referred to in our Terms of Use & Service.
4. We may occasionally amend this Privacy Policy to deal with updates to the law or changes in our business or operations. You should therefore re-visit this page from time to time to ensure that you have seen the latest version.
5. Nothing in this Policy is intended to prejudice any rights that you may have in relation to your Personal Data under applicable data protection law.

Personal Data that we collect

6. We may collect the following Personal Data about you:
- a. Your name and contact information including postal address, telephone and email address. We may also collect contact details relating to your employees, agents or representatives and you should ensure that the relevant individual agrees to the processing of his/her personal information as described in this Privacy Policy;
 - b. Details of personal identification such as passport and driving licence;
 - c. Account details and other information relating to your transactions with us and your use of our Services;
 - d. Payment data such as credit card and bank account details;
 - e. Credit history (should you open an account with us as a commissioning client);
 - f. Information on your collecting preferences and aspirations, your wine collection and your drinks choices; and
 - g. Other information that you submit to us, for example, when you have a comment/complaint, submit a question, take part in a customer survey or where you express an interest in receiving marketing material or request further information.

Sensitive Data

7. In the EU, certain personal data is known as sensitive data, Sensitive data is defined as data related to:
- a. racial or ethnic origin
 - b. political opinions
 - c. religious beliefs or other beliefs of a similar nature
 - d. trade union membership (within the meaning of the M1Trade Union and Labour Relations (Consolidation) Act 1992)
 - e. physical or mental health of condition
 - f. sexual life
 - g. the commission for any offence committed or alleged to have been committed, the disposal of such proceedings or the

sentence of any court in such proceedings.

If we collect sensitive data, we will process it in accordance with applicable law. By consenting to our Privacy Policy you expressly consent to us processing sensitive data about you. References in this policy to Personal Data include sensitive data.

What we do with the Personal Data

8. We store and use Personal Data that we collect for the following purposes:
- a. to provide you with services;
 - b. to perform or enforce any contract that we have with you;
 - c. to understand your needs and provide you with a better service or generally improve our services;
 - d. to send promotional and marketing materials about us, our services, special offers or other information which we think you may find interesting. We may contact you for these purposes by telephone, SMS, post, email, or automated message. You are free to request that we cease to process your personal data for direct marketing purposes although we may still need to hold and process your Personal Data for other purposes referred to in this Privacy Policy;
 - e. to contact you for market research purposes. We may contact you by email, phone or mail;
 - f. to customise our website in line with consumer interests or preferences;
 - g. for our internal business record keeping, tax, accounting, audit purposes;
 - h. to carry out identity and credit checks (for example, in relation to commissioning clients);
 - i. to collect moneys owed to us or our consignors;
 - j. in connection with legal and regulatory matters that we need to deal with;
- and
- k. other lawful purposes as may be notified to you from time to time.

To whom we may pass your Personal Data?

9. We may transfer your Personal Data externally;

- a. to professional advisors, third party suppliers or subcontractors who perform our contract obligations or who assist us in conducting our business such as data hosting, call centre operations, credit agencies, email management services analytics or other services in relation to our website or Services; and
- b. when we believe it is necessary to comply with the law; or we need to do this in connection with protecting our business or enforcing our legal rights, or we need to protect another person's rights, property, or safety or we need to act against actual or suspected illegal activity and reduce unwarranted risk to our business. This includes, but is not limited to, exchanging information with third parties such as the police, law enforcement agencies, the courts, fraud prevention agencies, debt collection agencies and regulatory authorities.

10. With your permission, we may sometimes use your Personal Data to send you promotional information from carefully selected third parties which you may find interesting.

11. We may transfer your Personal Data (as part of a transfer of our customer, supplier or marketing database) to a third party acquirer or investor where there is a reorganisation or sale of all or part of our business. In such a case we will take appropriate measures to ensure that the security of your Personal Data continues to be respected in line with this Privacy Policy.

12. All use of your Personal Data will be subject to us observing applicable legal rights (see the Your Legal Rights section below).

Consent to worldwide transfer and processing of Personal Data

13. Christopher Cooper operates globally. When you give us your Personal Data, it may be processed by us in all countries in

which we do business. Each of these countries has different privacy laws that afford varying levels of protection. Some of these countries may not offer the same legal protection to personal data as member states of the European Union. We will treat the privacy of your information in accordance with this Privacy Policy even if local laws afford your Personal Data a lesser degree of protection. By providing your Personal Data to Christopher Cooper, you consent to Christopher Cooper's transmission to, and processing of, your Personal Data in any jurisdiction.

Security

14. We are committed to ensuring that any Personal Data we hold about you is properly safeguarded. In order to prevent unauthorised access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to protect your Personal Data against unauthorized access or disclosure and any loss, destruction or damage.

15. We endeavour to take all reasonable steps to protect your Personal Data from external threats, however, please be aware that there are inherent security risks of sending information by public networks or on public computers and we cannot therefore guarantee the security of any data disclosed or transmitted over the internet.

16. Where you sign-up to receive Services, you may be provided with log-in information and may have the ability to set passwords to allow you to access a personal account page. Where we do so, it is on the condition that you will be responsible for ensuring that such log-in information and any passwords are kept secure and confidential at all times. You will not share any log-in information or passwords, without our express authorisation. We cannot be responsible for any loss or damage caused by your negligence, misuse of login details or your decision to share account access with others.

Phishing

17. Sometimes unauthorised individuals send email messages to consumers, purporting to represent a legitimate business, requesting that the consumer provide personal, often sensitive information, using the information (such as the email and domain names of) a legitimate trusted business. In reality, such information is sought for identity theft. This illegal activity has come to be known as “phishing”

18. If you receive an email or other correspondence requesting that you provide any sensitive information via email or to a website that seems suspicious to you, please do not provide such information, and report such request to us.

Cookies

19. We do not use cookies at this moment in time.

Links to Other Websites

20. Our website may contain links to other external websites (“Third Party Websites”). We do not have control over such Third Party Websites to which we link and we cannot be held responsible for the privacy of any Personal Data which you provide after you have used any link on our website to visit these Third Party Websites. You should exercise caution and look for any applicable privacy statement appearing on such Third Party Website.

Your Legal Rights

21. In accordance with your legal rights, you may request the following in connection with your Personal Data:

a. you can indicate to us at any time that you do not want your Personal Data to be used by us for direct marketing purposes, or that you do not want us to share your Personal Data with third parties. Please note that, due to the global nature of our operations, it may take several business days to process your request, and during that time, you may continue to receive marketing

information;

b. you can tell us if Personal Data that we hold about you is inaccurate or out of date;

c. you can ask us not to process Personal Data about you that causes substantial unwarranted damage or distress, however we may not always be bound to act on such a request (e.g. if we need to continue to process your data for contractual or legal reasons); and

d. you may request information regarding the Personal Data that we hold about you in the UK in accordance with the Data Protection Act. If you would like to make such a request please get in touch using the address in the “Contact Us” section below. Please note that a small administration fee may be payable and we may ask for further information to clarify your request or verify your identity before responding to your request.

Changes to this Privacy Policy

22. We reserve the right to change or update this Privacy Policy at any time.

Any changes or updates will take effect immediately upon posting of the revised Privacy Policy on our website.

Contact us

23. If you need to contact us in relation to this Privacy Policy or the matters above, please send an email to info@christophercooper.co.uk with the subject Privacy Policy/Personal Data.

This Privacy Policy was last updated 07/02/2017