



SCUDAMORES PUNTING COMPANY LIMITED PRIVACY NOTICE

Last updated 6 April 2021

Scudamores Punting Company Limited (trading as “Scudamore’s”) is committed to protecting and respecting your privacy.

Your privacy is very important to us, which is why we make sure you are always in control of what we do with your Personal Data, as defined below.

The purpose of this notice is to tell you what information we collect from you, how and when it may be collected and what happens to it. For the purpose of this notice “we”, “our” and “us” refers to Scudamores Punting Company Limited (“the Company”)

The Company is a data controller and can be contacted using the contact details below. This means that we make decisions about how and why we use your Personal Data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws.

This notice only applies to Personal Data processed by, or on behalf of, the Company.

We may collect information from you when you visit our website, use our services, contact us by telephone or email or receive a communication from us relating to our services.

If you are a business customer, this notice applies to the Personal Data you provide to us about individual participants/contacts from within your business (for example directors), or information about you as a sole trader or partnership.

Contact us

You can contact us via our address which is:

Scudamores Punting Company Limited

Granta Place, Mill Lane, Cambridge, CB2 1RS.

Registered company number 02787361

or by email: enquiries@scudamores.com

or via telephone: 01223 359750

If you have a specific question about this notice or how we use your Personal Data, you should contact us via the postal or email address set out above; please mark your communication as “Data Protection Enquiry”.

1. Definitions

In this notice the following words will have the following meanings:

Data Protection Laws means any applicable law relating to the processing, privacy, and use of Personal Data, including (a) in the United Kingdom, (i) the Privacy and Electronic Communications (EC Directive) Regulations 2003, SI 2003/2426, and any laws or regulations implementing Directive 2002/58/EC (ePrivacy Directive); and/or (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), Data Protection Act 2018 and/or any corresponding or equivalent national laws or regulations (b) in member states of the European Union, the GDPR and the ePrivacy Directive, and all relevant member state laws or regulations giving effect to or corresponding with any of them; and (c) any judicial or administrative interpretation of any of the above, any guidance, guidelines, codes of practice, approved codes of conduct or approved certification mechanisms issued by any relevant supervisory authority;

Personal Data means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this notice includes special categories of personal data.

2. Personal Data we collect from you

2.1. We will collect and process the following Personal Data about you:

2.1.1. **Personal Data you give us.** This is information about you that you give us as a customer of our services. The information you give us includes your name, e-mail address, phone number, postal address and financial information.

2.1.2. **Personal Data we collect about you.** We collect the following information automatically when you visit our website <https://www.scudamores.com/> "site":

2.1.2.1 technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information for use of our site, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

2.1.2.2 information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page;

2.1.2.3 information from social media activity (such as likes, shares and tweet) when you interact with us on social media;

2.1.2.4 information you provide if you report a problem with our website or service.

3. Cookies

A cookie is text file that is stored on your computer or mobile device by a website's server. Each cookie contains anonymised information about how you use our website and applications, which allows us to improve your experience of using our products and services.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy <https://www.scudamores.com/cookie-policy>.

4. Uses made of the Personal Data

4.1. We will only use your Personal Data to the extent that the law allows us to do so. Under the Data Protection Laws we will rely on the following legal bases for processing your Personal Data:

4.1.1. where you have given us your consent;

4.1.2. where it is necessary to perform a contract for our services we have entered into or are about to enter into with you;

4.1.3. where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests.

4.2. **Personal Data you give to us.**

We may use this Personal Data:

4.2.1. to process an enquiry received from you, or responding to an expression of interest in our services;

4.2.2. to carry out our obligations arising from any contracts for our services entered into between you and us and to provide you with the information, services that you request from us;

4.2.3. to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;

4.2.4. to contact you by email to request feedback and comments on our services or to provide information to you which may be of interest to you;

4.2.5. to notify you about changes to our services;

4.2.6. to ensure that content from our site is presented in the most effective manner for you and for your computer;

4.3. **Personal Data we collect about you.**

We may use this Personal Data:

- 4.3.1. To ensure that the services that you receive are correctly administered;
- 4.3.2. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 4.3.3. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- 4.3.4. as part of our efforts to keep our site safe and secure;
- 4.3.5. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

5. **Disclosure of your Personal Data**

- 5.1. We may use third party service providers to support our provision of the service. This could include venues and catering service providers cloud storage providers, content management systems, or other, less direct business functions, including (without limitation) IT support, hosting our data on cloud platforms, legal, accounting and audit service providers. Engagement and use of such suppliers will vary. We will ensure that you are provided with a list of appointed suppliers in advance of our sharing your Personal Data with them. We will have agreements in place with such service providers which will restrict how they are able to process your Personal Data and impose appropriate security standards on them. We only provide these organisations with the Personal Data that they need to be able to perform their services. In carrying out their services these service providers may become Data Controllers. They may have their own privacy notices which you should read, and they have their own responsibilities to comply with applicable data protection laws.
- 5.2. We use Tokenisation for card payments. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method.
- 5.3. You agree that we have the right to share your Personal Data with selected third parties including:
 - 5.3.1. business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - 5.3.2. analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 5.4. We will disclose your Personal Data to third parties:
 - 5.4.1. in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets;
 - 5.4.2. if the Company or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its clients will be one of the transferred assets; or

- 5.4.3. if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our standard terms and conditions of business and other agreements; or to protect the rights, property, or safety of the Company, our clients, or others.

6. Sensitive Categories of Personal Data

We may collect sensitive information if it is provided to us by you or on your behalf voluntarily. By giving us this information, you agree that we may use such information as set out in this notice.

7. Where we store your Personal Data

- 7.1. All information you provide to us is stored on cloud based solutions and storage platforms.
- 7.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Direct Marketing

We use Personal Data about you for the purposes as outlined in sections 4 and 5 above. You authorise us to use any email address or other contact information you provide to use at any time for such purposes. You can opt out of receiving electronic communications at any time. If you wish to do so, please follow the 'unsubscribe' link provided in the electronics communication or contact us using the details in section 1 above below.

9. International Transfer

- 9.1 If we transfer your Personal Data outside the European Union, we will only make that transfer if:
 - 9.1.1. that country ensures an adequate level of protection for your Personal Data;
 - 9.1.2. the recipient or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your Personal Data – this includes for example, the EU-US Privacy Shield which enables the secure transfer of personal data to the United States;
 - 9.1.3. we have put in place appropriate safeguards to protect your Personal Data, such as a contract with the person or entity receiving your Personal Data which incorporates specific provisions as directed by the European Commission;
 - 9.1.4. the transfer is permitted by applicable laws; or
 - 9.1.5. you explicitly consent to the transfer.
- 9.2 We have not set out the specific circumstances when each of these protection measures are used. You can contact us via the contact details above for the details as to how we protect specific transfer of your Personal Data.

10. Retention of Personal Data

- 10.1. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected your Personal Data.
- 10.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of that Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11. Control of and access to your Personal Data

- 11.1 You may withdraw your consent to receiving marketing at any by contacting us via the methods set out in section 1 above. We also offer the following controls:
 - 11.1.1. you may request access to or copies of the Personal Data that we hold about you;
 - 11.1.2. if you believe that any Personal Data we have about you is incorrect or incomplete, you can request that we rectify this. We will take steps to seek to correct or update any Personal Data if we are satisfied that the information we hold is inaccurate;
 - 11.1.3. you may request that we restrict our processing;
 - 11.1.4. you may request that your Personal Data be deleted where it is no longer necessary for the purposes for which it is being processed and provided there is no lawful basis for which we may continue to process such Personal Data;
 - 11.1.5. if we are processing your Personal Data to meet our legitimate interests (as set out above), you may object to the processing of your Personal Data by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your Personal Data for those purposes;
 - 11.1.6. if you have objected to our processing as out above;
 - 11.1.7. you may withdraw any consent given to processing (this will not affect the lawfulness of processing based on consent before its withdrawal); or
 - 11.1.8. if we are processing your Personal Data automatically for the purposes of performing our contract for services with you, you may have the right to request that the Personal Data we hold about you be transferred to a third party data controller.

If you would like to exercise any of these controls, please contact us, headed “Data Protection matter” using the contact details as set out above.

- 11.2 You may also request that we restrict the processing of your Personal Data to that to which you have consented or for the establishment, exercise or defence of legal claims or the protection of the rights of another person, whilst we verify your Personal Data as set out in point 11.1.2 above; pending verification of our legitimate grounds as set out in point 11.1.4 above; or if the processing is unlawful or no longer necessary, but you wish us to retain your Personal Data for the purposes of establishing, exercising or defending legal claims.
- 11.3 Please contact us if you would like to exercise any of these rights or if you have any concern about how your Personal Data is processed using the contact methods set out in section 1 above, headed “Data Protection matter” and we will try to resolve your concerns. However,

if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>). You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

12. Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy notice.