

Unit 7 River Park Industrial Estate Billet Lane, Berkhamsted Hertfordshire, HP4 1HL

Grafton Optical Privacy Policy

Revision date: 8 May 2018

At Grafton Optical, your privacy is of paramount importance to us. When you submit a contact form or sign up to our database on our website, some of your personal information is collected and stored by us. All data collected is stored on secured servers and used full compliance with GDPR, PECR and other data protection regulations.

This page informs you of our policies regarding the collection, use and disclosure of your personal data and the choices that you have associated with that data. The security of your information is very important to us and if you wish to remove your details from our mailing/ client list or simply wish to view what data we hold on you or your company, please contact us.

The legal basis on which we process your personal data in these circumstances is our legitimate interest to provide you with the best possible service that we can. We will only ever contact you with information that we believe will be of benefit to you and your business. By using the Grafton Optical website, you agree to the collection and use of information in accordance with this policy.

Your personal data

While using our website, you have the option to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include:

- Email address
- First name and last name
- Phone number
- Postal code
- Cookies and Usage Data

We may use your Personal Data to contact you with marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

GDPR & PECR

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) aims to harmonize data protection legislation across EU member states, enhancing privacy rights for individuals. The GDPR sets out six lawful grounds for processing, one of which is processing under the Legitimate Interests of a Controller. Grafton Optical Company Ltd has undertaken a Legitimate Interests Assessment which conforms to the Guidance for Legitimate Interest Assessments provided by the Information Commissioner's Office ('ICO').

Usage data

We may also collect information on how our website is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's IP address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.



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Location data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to determine which member of our area teams is best located to assist you. You can enable or disable location services when you use our website at any time, through your mobile device settings.

Tracking Cookies data

We use cookies and similar tracking technologies to track the activity on our website and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

However, if you do not accept cookies, you may not be able to use some parts of our website. Examples of Cookies we use:

- Session Cookies We use Session Cookies to operate our website
- Preference Cookies We use Preference Cookies to remember your preferences and various settings
- Security Cookies We use Security Cookies for security purposes

Use of data

Grafton Optical Company Ltd uses the collected data for various purposes:

- To provide and maintain our services
- To notify you about changes to our services
- To provide customer support
- To gather analysis or valuable information so that we can improve our services
- To monitor the usage of our website
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Transfer of data

Grafton Optical Company Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your Personal Data will take place to another organisation unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of data

Under certain circumstances, Grafton Optical Company Ltd may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). Grafton Optical Company Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Grafton Optical Company Ltd
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability



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Security of data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your rights

Grafton Optical Company Ltd aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us. Please note that we may ask you to verify your identity before responding to such requests.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having your activity on our website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: http://www.google.com/intl/en/policies/privacy/

MailChimp

We use a third-party provider, MailChimp, to deliver our email communications. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our communications to you. For more information, please see <u>MailChimp's privacy notice</u>.

You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing us on marketing@graftonoptical.com.

Behavioral remarketing

Grafton Optical Company Ltd uses remarketing services to advertise on third party websites.

Twitter

Twitter remarketing service is provided by Twitter Inc. You can opt-out from Twitter's interest-based ads by following their instructions: https://support.twitter.com/articles/20170405. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: https://twitter.com/privacy

Facebook

Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: https://www.facebook.com/help/164968693837950

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: https://www.facebook.com/help/568137493302217. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the European Interactive Digital Advertising Alliance in Europe http://www.youronlinechoices.eu/, or opt-out using your mobile device settings. For more information



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on the privacy practices of Facebook, please visit Facebook's Data Policy: https://www.facebook.com/privacy/explanation

Links to other sites

Our website may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes and post the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes.

Contact us

If you have any questions about this Privacy Policy, please contact us by email on marketing@graftonoptical.com or call us on 01923 233980.