

BESTWAY RETAIL LIMITED

(trading as Bargain Booze, Select Convenience, Wine Rack and Central Convenience)

WEBSITE & APP PRIVACY NOTICE

1 Introduction

- 1.1 We take your privacy seriously. This Privacy Notice (together with our Cookies Policy) sets out details about your privacy rights and how we gather, use and share your personal data – including the personal data we already hold about you now and any further personal data we might collect about you, either from you or from a third party when you use this our websites, including www.bargainbooze.co.uk, www.winerack.co.uk and www.centralconveniencestores.co.uk (each a **Website**), and/ or use the Bargain Booze Mobile App (the **App**).
- 1.2 If you have any questions about how we use your personal data, please contact gdpr@bestwayretail.co.uk .

2 About us

- 2.1 When we say 'Bestway' in this Privacy Notice, we mean Bestway Retail Limited.
- 2.2 Bestway is a 'controllers' of your personal data and are referred to as 'we', 'us' or 'our' in this Privacy Notice.
- 2.3 Bestway Retail Limited is registered with company number Co No. 4103203 and is registered with the Information Commissioner's Office, or ICO, under registration number ZA387140.

3 Your Privacy Rights

- 3.1 In addition to the right to be informed about how we use your personal data (as set out in this Privacy Notice), you have various other rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact gdpr@bestwayretail.co.uk :

Right to object: You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes. Please contact us as noted above, providing details of your objection.

Access to your personal data: You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making.

Right to withdraw consent: If you have given us your consent to use your personal data, you can withdraw your consent at any time. In particular, if you have given us consent to send you marketing emails, you can withdraw your consent by clicking the "unsubscribe" link in any marketing email which you receive, by emailing us at gdpr@bestwayretail.co.uk, writing to us at Bestway Retail Limited, Data Protection Office, Unit 1 Weston Road, Crewe CW1 6BP or, if you are registered to shop online you

can manage your preferences on the manage my data tab or unsubscribe using any of the other methods above.

Rectification: You can ask us to change or complete any inaccurate or incomplete personal data held about you.

Erasure: You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

No automated decision-making: Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in relation to customers and suppliers, but we will notify you by updating this Privacy Notice if this changes.

3.2 We may need to verify your identity in order to process your request and ask you to provide valid identification documents to allow us to do so.

4 Information We Collect About You

Information you give us

4.1 We will collect your name and contact details, if you have submitted an enquiry via the Contact Us page on the Website or provided your email address in-store.

4.2 When you register with Bestway Retail's Websites, including "The Club", or placing orders or making "Click & Collect" orders) or the App, we collect and use some or all of the following:

(2.a) full name;

(2.b) date of birth;

(2.c) address, e-mail address and contact details;

(2.d) your preferred store;

(2.e) credit or debit card details;

(2.f) gender;

(2.g) an indication of what offers and products you are interested in;

(2.h) an indication of your hobbies and pastimes and family time.

4.3 If you request an account with us for newspapers or fuel, we collect your name, address retain information on your purchases of newspaper or fuel (as appropriate) and the balances due.

- 4.4 We collect and use the following personal data about you when you become a supplier and fill in forms on the Website or hard copy application forms:
- (4.a) full name;
 - (4.b) address and contact details; and
 - (4.c) you may also be required to give us information about your business, business partners, beneficial owners or directors in which case you must ensure that you have permission to do this.

Other Information we collect

- 4.5 We also collect and use the following personal data about you indirectly:
- (5.a) if you are a supplier of Bestway, information obtained from any credit checks or other checks we are required to carry out for legal and regulatory purposes (see the section on 'Anti Money Laundering/ Sanctions' below for further information);
 - (5.b) in order to administer the Website and understand how the Website is used, we may collect technical information including your IP address, your login information, products you have viewed or searched, browser type, plug-ins you use, operating systems and platforms, URL, page response times, download errors, length of visits to certain pages, page interaction information, methods used to browse away from a page;
 - (5.c) information collected through the App, such as your access to it and redemption of offers;
 - (5.d) purchases you make via a Website using “click and collect” or for orders placed online; and
 - (5.e) information collected using CCTV surveillance in our stores or other sites.

5 How We Use Your Personal Data and Legal Basis

- 5.1 We use personal data held about you for the following purposes in line with our legitimate interests to administer the Website and the App, to engage with users when they request our products and services, and provide us with products and services and to protect and exercise our rights as a business:
- (1.a) to respond to your queries;
 - (1.b) to manage your participation in the Club, which may include issuing emails, SMS messages and vouchers to advise you of promotions that take account of your personal preferences;
 - (1.c) to provide you with your goods and information about your goods and to provide you with information via the App, email, or SMS about our promotions and offers, to make suggestions and recommendations to you about goods or services that may interest you (for further information, see the section on 'Marketing' below);
 - (1.d) to analyse your purchases and purchase behaviour so we can provide you with vouchers and notifications of promotions that are tailored to you;

(1.e) if fraud is suspected or identified then this will be recorded and details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. The information may also be used to prevent theft, fraud and money laundering for example, when checking details for customer registrations, credit applications or managing credit accounts; and

(1.f) in relation to CCTV, for the prevention of crime and for security purposes.

5.2 We will also use your personal data, for example, your name, address and contact details, to carry out our contractual obligations to provide you with products or services which you have ordered or purchased from us and to contact you in relation to such products and services;

6 Special Categories of Personal Data

6.1 Special protection is given to certain kinds of personal data that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership ('special categories of personal data') or about your criminal convictions or offences.

6.2 Where we collect any special categories of personal data, we will take appropriate steps to ensure that we have explicit consent or another legal basis to hold, use and retain the information.

7 Disclosure of Your Personal Data

7.1 We may share your personal data:

(1.a) with other members of the Bestway group – for example, for administration or reporting purposes, or for marketing purposes where you have indicated that you wish to receive marketing from other group companies;

(1.b) selected third parties for the performance of our contractual obligations with you such as Franchisees who may operate the business where you collect "click and collect" goods from;

(1.c) sub-contractors we may use in technical and payment services;

(1.d) where you have agreed to receive marketing emails from us, we need to pass your personal data on to our service providers who help us with these marketing activities;

(1.e) analytics and search engine providers that assist us with improvement and optimisation of our site who may anonymise the information and send on to third parties for statistical purposes; and

(1.f) credit reference agencies and other background check providers.

7.2 Occasionally, we may share personal data with relevant third parties where:

(2.a) you have given us your consent to do so;

(2.b) we sell or buy any business or assets or if we are under a duty to disclose or share your personal data to comply with a legal obligation (for example, we may need to

share CCTV footage of you with the police) or to enforce or apply our Terms of Use, Cookies Policy or Terms and Conditions of Sale; or

(2.c) it is fair and reasonable for us to do so in the circumstances.

8 Where We Store Your Personal Data

8.1 We may need to transfer your information outside the UK to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area ("EEA"), such as the USA.

8.2 We may need to transfer your personal data to territories that are outside the EEA. We will only transfer your personal data outside the EEA where either:

(2.a) the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal data, or

(2.b) we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal data is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

8.3 If you would like further information, please contact gdpr@bestwayretail.co.uk.

9 Keeping You Up To Date

9.1 If you are a customer, we will send you emails, SMS messages and messages via the App to communicate relevant news and information about promotional products unless you tell us that you do not wish to receive them.

9.2 You can unsubscribe at any time by clicking the "unsubscribe" link in any marketing email which you receive, by emailing us at gdpr@bestwayretail.co.uk, writing to us at Bestway Retail Limited, Data Protection Office, Unit 1 Weston Road, Crewe CW1 6BP or, if you are registered to shop online you can manage your preferences on the manage my data tab or unsubscribe using any of the other methods above.

10 How Long We Hold Your Personal Data

10.1 We will not retain your personal data for any longer than is necessary for our purposes, including for the purposes of satisfying any legal, accounting or reporting requirements. If you have any questions about data retention than please email gdpr@bestwayretail.co.uk.

10.2 Where we have been using your personal data to provide you with marketing, we will delete your personal data following your request to be removed from our marketing list.

11 Right to Complain

You can make a complaint to us by contacting us via gdpr@bestwayretail.co.uk or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

12 Changes to this Privacy Notice

This Privacy Notice will be reviewed periodically and we will update it if we make any material changes to the manner in which we process and use your personal data.