

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

THE CLUB PRIVACY POLICY

1. Introduction

- 1.1. We take your privacy seriously. This Privacy 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 the Club, either online or via the Club 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 Policy, we mean Bestway Retail Limited.
- 2.2. When we say 'Bestway Group' in this Privacy Policy, we mean subsidiaries of Bestway Group Limited.
- 2.3. Bestway is the 'controller' of your personal data and is referred to as 'we', 'us' or 'our' in this Privacy Policy.
- 2.4. Bestway Retail Limited is registered in England and Wales with company number 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 Policy), 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 and whether it has been used for any automated decision-making.
 - **Right to withdraw consent:** If you have given us 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 emails you receive, by emailing us at gdpr@bestwayretail.co.uk, writing to us at Data Protection Office, Bestway Retail Limited, Unit 1 Weston Road, Crewe, CW1 6BP, or, you can manage your preferences by logging into your Club account.

- **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 Policy 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. To be eligible to join the Club, you must provide us the mandatory information listed below. You will not be able to join the Club if you refuse to provide the mandatory information.

Mandatory Information	How we use this information
Email Address	We will email you a link that you will be required to click on to confirm your identity. This completes the registration process. You will then be given the option to provide information regarding your preferences.
Date of Birth	You cannot join the Club unless you are 18 years old or above. We will use your date of birth to verify that you meet this requirement.

4.2. At the same time as providing the mandatory information listed in Clause 4.1, we will ask you to provide the voluntary information listed below. Provision of this information is optional so you do not have to provide it and you will still be able to join the Club.

Voluntary Information	How we use this information
Postcode	We will use your postcode to locate stores in your area and send you promotions and news for these stores.
Name	We will use your first name to personalise the greeting on your profile and in our email communications.
Mobile number	We will send you direct marketing by SMS as you may not always have access to your email.

- 4.3. After you have completed the Club registration process, we will send you an email and ask you to provide us with the voluntary information listed below. Provision of this information is optional so you do not have to provide it, but doing so will allow us to send you targeted direct marketing, such as promotions and news.

Voluntary Information	How we use this information
Gender	We will use this to send you bespoke direct marketing from profiling based on gender.
Products you are interested in	We will use this information to send you promotions and news about products that you are interested in.
Hobbies and pastimes	We will use this information to send you promotions and news about products that are related to your hobbies and pastimes.
How you spend family time	We will use this information to send you promotions and news tailored to your family lifestyle.

Other Personal Data we collect

- 4.4. We may also collect and use technical information about you. This data will allow us to administer the Club and our websites, and understand how both are used.
- 4.5. The technical information we may collect includes your IP address, login information, products you have viewed or searched, browser type, plug-ins used, operating systems and platforms, URL, page response times, download errors, length of visits to certain pages, page interaction information and methods used to browse away from a page.

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 Bargain Booze website (www.bargainbooze.co.uk), the Club website (<https://club.bargainbooze.co.uk>) and the Club App, and exercise our rights as a business:
- 5.1.1. to respond to your queries;
 - 5.1.2. 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;
 - 5.1.3. to provide you with information via the Club, email, or SMS about our promotions and offers, to make suggestions and recommendations to you about goods or services that may interest you; and
 - 5.1.4. to analyse your purchasing behaviour so we can provide you with vouchers and notifications of promotions that are tailored to you.

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:

- 7.1.1. 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;
- 7.1.2. selected third parties for the performance of our contractual obligations with you;
- 7.1.3. sub-contractors we may use in technical and payment services;
- 7.1.4. 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; and
- 7.1.5. 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.

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

- 7.2.1. you have given us your consent to do so;
- 7.2.2. 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 or to enforce or apply our Terms of Use, Cookies Policy or Terms and Conditions of Sale; or
- 7.2.3. 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:
 - 8.2.1. the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal data, or
 - 8.2.2. 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 Club 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

- 11.1. 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 Policy

- 12.1. This Privacy Policy 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.