

# Privacy Policy

Our services are provided by Aceo Ltd (“Aceo”, “we”, “us” or “our” as appropriate) and its related companies. We take very seriously the privacy of our Customers and Website users, and the security of their personal information.

## INTRODUCTION

For your convenience, our Website(s) may contain links to a number of other websites, both inside and outside Aceo. The privacy policies and procedures described here do not apply to those sites; we suggest contacting those sites directly for information on their data collection and distribution policies.

The purpose of this Privacy Policy is to set out the principles governing our use of personal information that we may obtain about you. By trading with us, using the Website, or by registering to our mailing list that we provide, you agree to this use. We ask you to read this Privacy Policy carefully.

## CHANGES TO THIS PRIVACY POLICY

We may change our Privacy Policy from time to time. We therefore ask you to check it occasionally to ensure that you are aware of the most recent version that will apply each time you trade with us or access our Website(s). We will notify you about significant changes by placing a prominent notice on our website.

## INFORMATION COLLECTION AND USE

You must not provide us with your personal information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are purchasing from us or accessing the Website(s). We do not intend to collect personal information from any individual under the legal purchase age, or to market alcoholic beverages to anyone under the legal purchase age. If we receive notice or believe that someone under the legal purchase age has provided us with personal information we will make every reasonable effort to remove such personal information from our files, or to flag such personal information and (to the extent permitted by law) retain it for the sole purpose of ensuring that it is no longer used.

When registering with our Website(s), contacting us, trading with us, completing surveys or questionnaires, entering competitions, promotions or events sponsored by us, and/or posting information on public areas of our Website(s), we may collect personal information such as your name, age, gender, contact details (such as telephone/mobile, email, skype), personal/company address, company name, personal preferences, and details of your website use.

Sometimes, we will give you the option to choose whether you would like to receive information from us or not (e.g. by choosing to opt in or opt out of receiving emails from us with news about our brands or promotional offers). However, you will sometimes not have the option to opt out, such as when we are satisfying the obligations of a contract with you.

## USE OF COOKIES

We may also obtain information about your general internet usage by using a cookie file. Cookies are small text files that are placed on your computer by websites that you visit. Cookies can't harm your computer, but we do use encrypted information gathered from them to help improve your experience of the Website(s) and to deliver a better and more personalised service.

Cookies enable us to:

- estimate our audience size and usage pattern,
- recognise you when you return to the Website(s).

So that you can make full use of the personalised features on our Website(s), your computer, mobile phone or other device, you will need to accept Cookies.

These technologies may record your IP address, type of device, date, and time associated. Where the use of MailChimp is used this may also include your email address with each open and click for a campaign. We use this data to create reports about how an email campaign performed and what actions subscribers took.

MailChimp campaigns also automatically place single pixel gifs, also known as web beacons, in every MailChimp email sent by us. These are tiny graphic files that contain unique identifiers that enable us to recognise when subscribers have opened an email or clicked certain links.

## INFORMATION SHARING AND DISCLOSURE

In order to provide our services to you, we may disclose your Personal Data to any member of our related companies, and trusted Third Parties that help us to process Personal Data.

Apart from the use and sharing of your personal information in the limited circumstances already described, the only ways we may share your information are if we need to disclose personal information to comply with any applicable law or valid legal process.

## TRANSFER OF INFORMATION OUTSIDE OF THE EEA

Your personal information may be transferred to, stored at, or processed at a destination outside the EEA. Personal information from individuals who reside in a member state of the European Economic Area and Switzerland is controlled by us in the UK and may be processed on our behalf by trusted Third Parties outside the UK. Where possible, we use Privacy Shield approved Third Parties or have EU approved Model Contractual Clauses in place with these Third Parties for the international transfer, storage or processing of personal information collected from within the European Economic Area and Switzerland.

By submitting your personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## PRIVACY SUPPORT AND CONTACT INFORMATION

Under the General Data Protection Regulations, you have the right to see the personal information that we hold about you, whether collected through your use of our Website or through any communications that you have had with us.

If you have any request, questions, suggestions or wish to remove yourself from our records, please contact us by email to [info@aceo.co.uk](mailto:info@aceo.co.uk) or by post to the Data Protection Team at the address below.

Head Office:

Aceo Ltd

No. 9, The Old Barn

Highnam Business Centre

Gloucestershire

GL2 8DN

## TERMINOLOGY

Third Parties – these are trusted organisations and people other than those associated to Aceo.

Website – [www.aceo.co.uk](http://www.aceo.co.uk), [www.murray-mcdavid.com](http://www.murray-mcdavid.com), [www.murraymcdavidboat.co.uk](http://www.murraymcdavidboat.co.uk),

General Data Protection Regulations – The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union, and the European Commission to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EEA.

Privacy Shield - The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce.

Model Contract Clause - The model contract clauses impose obligations on both the exporter and the importer of the data to ensure that the transfer arrangements protect the rights and freedoms of the data subjects required under the GDPR.