

# AUGUSTUS BRANDT ANTIQUES INTERNATIONAL LIMITED

## PRIVACY NOTICE

### Introduction

Welcome to Augustus Brandt Antiques International Limited's privacy notice.

Augustus Brandt respects your privacy and is committed to protecting your Personal Data. This privacy notice will inform you as to how we look after your Personal Data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy was last updated in May 2018.

### 1. Purpose of this privacy notice

This privacy notice aims to give you information on how Augustus Brandt collects and processes your Personal Data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### 2. Controller

Augustus Brandt Antiques International Limited (collectively referred to as "we", "us" or "our" in this privacy notice) is the controller and responsible for your Personal Data. We are a company incorporated in England and Wales and our company registration number is 06524638. Our registered office is at The Martlet Partnership, Martlet House, E1 Yeoman Gate, Yeoman Way, Worthing, West Sussex BN13 3QZ.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

#### Contact details

Our full details are:

Full name of legal entity: Augustus Brandt Antiques International Limited

Email address: [enquiries@augustusbrandt.co.uk](mailto:enquiries@augustusbrandt.co.uk)

Postal address: Augustus Brandt, Newlands House, Pound Street, Petworth, West Sussex, GU28 0DX.

Telephone number: 01798 344722

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 3. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### **4. The data we collect about you**

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

In Schedule 1, we have set out, in table form, a description of the different types of Personal Data we may collect, use, store and transfer, the ways we plan to use the Personal Data, and the legal justification on which we rely in order to do so. Where we rely on the justification that it is necessary to process the Personal Data for our Legitimate Interests we have, where appropriate, also identified what we consider those Legitimate Interests to be.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

#### **5. How is your Personal Data collected?**

We use different methods to collect data from and about you including through:

##### **(a) Direct interactions.**

You may give us your identity, contact and financial data by filling in forms in store or on-line, or by corresponding with us by post, telephone, email or otherwise. This includes Personal Data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us your details at networking events; or
- give us some feedback.

##### **(b) Automated technologies or interactions.**

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please visit our website.

**(c) Third parties or publicly available sources.**

We may receive Personal Data about you from various third parties and public sources as set out below

- Technical Data from:
  - (a) analytics providers, such as Google based outside the EU;
  - (b) advertising networks Facebook, Instagram, Twitter, LinkedIn, Pinterest, Google and Bing based outside the EU;
  - (c) search information providers such as Google and Bing based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Authipay based inside the EU.
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
- Identity and Contact Data from recommendations and referrals from existing clients and contacts based inside or outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the electoral roll based inside the EU.

**6. How we use your Personal Data**

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

See Schedule 1 for more details.

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us or other companies within our group if you have requested information from us, purchased goods or services from us or provided us with your details when you entered a competition or registered for a promotion provided, in each case, that you have not opted out of receiving that marketing.

Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to such marketing at any time by [contacting us](#).

We will get your express opt-in consent before we share your Personal Data with any company outside the Augustus Brandt group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, ]by following the opt-out links on any marketing message sent to you or by **contacting us** at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **7. Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **contact us**.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **8. Disclosures of your Personal Data**

We may have to share your Personal Data for the purposes set out in Schedule 1 with external third parties such as:

- Service providers acting as processors such as Mailchimp, based in the USA, who provide marketing services, appointed couriers based inside or outside the EU who provide delivery and other fulfilment services and DataTherapy based inside or outside the EU, who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We may also share your Personal Data, in strict confidence, with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

## **9. International transfers**

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your Personal Data will involve a transfer of data outside the EEA.

Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

## **10. Data security**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **11. For how long will you use my Personal Data?**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 your 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.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes.

Unless you have opted out of receiving marketing communications from us or other companies within our group, we will retain your Personal Data for such purpose indefinitely, or for so long as we wish to continue sending you such communications.

## **12. Your legal rights**

Data protection laws gives you a number of rights, under specified circumstances in relation to your Personal Data. These rights, and how to exercise them, are described in more detail in Schedule 2.

## SCHEDULE 1

### TYPES OF PERSONAL DATA, AND LEGAL JUSTIFICATION FOR HOW WE WILL USE IT

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

In the table below, we use the following abbreviations:

#### Type of data

- 1 = Identity Data** such as first name, maiden name, last name, username or similar identifier, marital status, title, age, date of birth and gender.
- 2 = Contact Data** such as billing address, delivery address, email address and telephone numbers.
- 3 = Financial Data** such as bank account and payment card details.
- 4 = Transaction Data** relating to events you have asked us to organise for you, such as the date and location of the event, the budget, number of guests, details about payments to and from you and other details of products and services you have purchased from us, photographs or videos taken by our suppliers at the event, and any other information you choose to send to us in connection with your event, such as photographs of the inside or outside of the event location.
- 5 = Technical Data** about the devices you use to access this website, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform and other technology.
- 6 = Profile Data** such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, how you found out about us and what you typed into Google or other search engines to find us.
- 7 = Usage Data** such as information about how you use our website, products and services and about your visits to and use of our website including your referral source, length of visit, page views and website navigation.
- 8 = Marketing and Communications Data** such as your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## Legal justification for processing

**A =** We process your Personal Data because it is **necessary for the performance of a contract** to which you are a party or to take steps at your request before entering into such a contract.

**B =** We process your Personal Data because it is **necessary for compliance with a legal or regulatory obligation** to which we are subject.

**C =** We process your Personal Data because it is necessary for the **legitimate interests** of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by **contacting us**

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please **contact us** if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	1, 2	A
To process and deliver your order including: (a) Deliver the goods or services you purchase from us (b) Send statements and invoices (c) Manage payments, fees and charges (d) Collect and recover money owed to us	1, 2, 4, 8	A, C (to recover debts due to us)
To manage our relationship with you which will include: (a) Sending you general non-marketing commercial communications; (b) Sending you email notifications which you have specifically requested; (c) Sending you our newsletter and other marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you; (d) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	1, 2, 6, 8	A, B, C (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey	1, 2, 6, 8	A, C (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, dealing with enquiries and complaints made by or about you relating to the website, data analysis, testing, system maintenance, support, reporting and hosting of data, security and fraud prevention)	1, 2, 5	B, C (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To improve your browsing experience by personalising the website and delivering relevant website content and advertisements to you, to enable your use of the services available on the website, and to measure or understand the effectiveness of the advertising we serve to you	1, 2, 5, 6, 7, 8	C (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	5, 7	C (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	1, 2, 5, 6, 7	C (to develop our products/services and grow our business)

## SCHEDULE 2

### YOUR LEGAL RIGHTS

You have the following rights with regard to the Personal Data we hold about you, namely the right to:

- (a) **Request access** to your Personal Data (commonly known as a "subject access request").

This enables you to receive a copy of the Personal Data we hold about you and to check that we are processing it lawfully.

- (b) **Request correction** of the Personal Data that we hold about you.

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- (c) **Request erasure** of your Personal Data.

This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it.

You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- (d) **Object to processing** of your Personal Data

This applies 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 as you feel it impacts on your fundamental rights and freedoms.

You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- (e) **Request restriction of processing** of your Personal Data.

This enables you to ask us to suspend the processing of your Personal Data where:

- (i) you want us to establish the data's accuracy;
- (ii) our use of the data is unlawful but you do not want us to erase it;
- (iii) you need us to hold the data even if we no longer require it because you need it to establish, exercise or defend legal claims; or

(iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) **Request the transfer** of your Personal Data to you, or to a third party you have chosen, in a structured, commonly used, machine-readable format.

This applies only where you initially provided the Personal Data to us in electronic form and (i) we needed to use it to perform a contract with you, or (ii) we are relying on your consent to process the Personal Data.

(g) **Withdraw consent at any time**

This is relevant only where we are relying on such consent to process your Personal Data. It will not affect the lawfulness of any processing carried out before you withdraw your consent and it will, of course, not affect the lawfulness of any processing which is not reliant on your consent. Please note that, if you withdraw a consent on which we are relying, we may not be able to provide certain products or services to you.

If you wish to exercise any of the rights set out above, please [contact us](#).

**Note:**

1. You will not have to pay a fee to exercise any of the above rights. However, we may refuse to comply with a subject access request access or, alternatively, may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive.
2. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of the above rights. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
3. We try to respond to all legitimate requests within one month but, if your request is particularly complex or you have made a number of requests, it may take us longer. In this case, we will notify you and keep you updated.
4. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.