

# PRIVACY POLICY

Flowervision Ltd respect your privacy and is committed to protecting the personal information you share with us. Your privacy is important to us, please read the following to fully understand our privacy policy. This Privacy and Cookie Policy describes how we collect, use, share, store or otherwise process the information we hold about you.

Your personal information allows us to provide the products and services you have asked for, as well as enabling us to improve those products and services by understanding your interests and preferences.

## Who we are

Flowervision Ltd ("we", "our", "us") is the data controller that you provide information too.

## Legal basis for using your information

All organisations need a legal reason to use your personal information. We are conscious of our legal responsibilities as a "data controller" and we shall endeavor to ensure that the personal information we obtain and use will always be held, used, transferred and otherwise processed in accordance with our legal obligations. If we don't have a reason, we can't use your personal information. There are a number of legal grounds that enable data processing. It's quite complicated but below are the most relevant grounds you should be aware of.

### *1. With your consent (C)*

There are some activities where we process personal information with your consent and whenever possible we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies. You may withdraw your consent at any time by emailing [info@flowervision.co.uk](mailto:info@flowervision.co.uk)

However, if you do so, we may not be able to provide the product or service you have requested. For example, where we want to send you invoices/statements by email or sending marketing/delivery information via WhatsApp we would first ask your permission to opt-in. If you opt-in, you may request to opt-out at any time. We will indicate in the Policy where we rely on consent.

### *2. For a legitimate interest (LI)*

Sometimes we may use your information to help achieve our business objectives but only where that activity doesn't negatively affect your rights. For example, we might use your social media information to analyse the flowers you are using in your displays and tailoring our purchasing to stock seasonal flowers that you use.

#### *4. To comply with legal obligations (LO)*

There may be situations where we need to use your information to comply with legal obligations. For example, we are required by law to keep records of who is in our premises in case there is an emergency, so we can make sure you're safe.

Similarly, CCTV footage are recorded and retained for at least 3 months to prevent crime, to comply with licensing requirements and to enhance personal safety.

#### *What information do we collect?*

When you set up an account or interact with our website/cash and carry we collect information about you and that particular interaction. Generally this may include:

- Your personal details
- Contact information, and preferences
- Bank Account information, if that information is provided to us.
- Website address
- Information about your use of our website/Cash and Carry
- Images of you in areas of our premises covered by CCTV
  1. We use CCTV in our property for the purposes of safety and crime detection and monitoring. We only store the information collected by CCTV for a period of time which allows us to assist regulatory bodies and law enforcement agencies. This information is kept in secure environments and access is restricted to managerial personnel.
  2. We have signs in place at main entry points informing people that CCTV is in operation and images are being monitored and recorded for the purposes of crime prevention and public safety
- Conversations you have when you call our office / company mobile numbers.
- Information about anyone you're visiting with, if that information is provided to us
- Information about the devices you use to interact with us
- Where you provide information to us about other people, you need to make sure you have their permission to do so.

#### *When and how we collect your information?*

We collect information you provide to us directly and indirectly when interacting with our products and services, including when you stay with us.

##### *1. You provide information directly to us*

This may include when you:

- Apply for an Account at Flowervision via filling in an Application form on site or online.
- Create, use or manage an online account – In
- Sign up to our WhatsApp groups
- Visit our website or use our apps
- Fill out our online forms

- Visit our Premises
- Access premises Wi-Fi for internet
- Use social media login functionality
- Interact with us in online forums, by email, text, or on [social media](#)
- Complete our market research/customer surveys
- Enter competitions or promotions
- Requests, complaints and/or disputes

### *2. You provide information via our processors*

There may be situations where we use data processors - companies who act on our behalf - to collect your information for us. These processors can only use your information in accordance with our instructions and for the purposes in this Policy.

### *3. You provide information via our websites*

We also receive information about you indirectly when you interact with us. For example, when you visit our websites or use our apps the devices you use may provide us with your general location (like which country or region you're in), if you are using ad-blockers, and your IP address. We may also receive information from cookies and other technologies that are on your device or browser. For more information on our use of cookies, please see the section on cookies.

### *How we use your personal information*

The reason we use your information will often be obvious from the way you interact with us. For example, if you buy products from us, we would use that information to administer an invoice for you and send the invoice/statement to you. However, our uses of your information may not always be so obvious. You can find out more below. When you provide your information to us, we may use it to:

### *Use of Personal Information*

Legal basis for processing (Where there is more than one, the exact grounds will depend on the activity – Click links to see the section above for an explanation of each)

- Provide you with the products you have requested, including administering your account, responding to any enquiries, complaints or requests you may have C, LI
- To manage our relationship with you C, LI
- Send you market research surveys C, LI
- Tailor our service to your preferences, where you tell us about them C, LI
- Make decisions about what direct marketing to show you based on how you have interacted with us LI
- Improve our products and services online and offline, including our websites and apps LI
- Allow you to interact with us online and offline, in forums, on social media and elsewhere C, LI
- Monitor the use of our products and services and content LI, LO
- Verify your identity LI

- Conduct analysis, system testing and statistical research LI, LO
- Comply with legal obligations on us LI, LO
- Detect ad blockers and other technologies that affect the services we provide C, LI
- Send you product or service related communications, service messages C, LI, LO
- Send you direct marketing, where you have consented C, LI
- Allow social sharing functionality C, LI
- Keep guests safe and ensure the security of our premises LI, LO
- Conduct data matching and audience insight activities LI
- Detect ad blockers LI
- Ensure the acceptable use of our services LI, LO
- Facilitate payments and credit checks C, LI, LO
- Facilitate the restructuring or sale of all or part of our business C, LI, LO
- Investigate and respond to disputes C, LI, LO
- Provide you with help and support where it may be required. LI

### *(C) With your consent*

There are some activities where we process personal information with your consent and whenever possible we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies. You may withdraw your consent at any time by emailing [info@flowervision.co.uk](mailto:info@flowervision.co.uk). However, if you do so, we may not be able to provide the product you have requested. For example, where we want to send you marketing messages by email, we would first ask your permission to opt-in. If you opt-in, you may request to opt-out at any time. We will indicate in the Policy where we rely on consent.

### *(LI) For a legitimate interest*

Sometimes we may use your information to help achieve our business objectives but only where that activity doesn't negatively affect your rights.

### *(LO) To comply with legal obligations*

Further Information on how we use your information. We sometimes use your information for reasons that we think you might want a bit more detail on, so to help we have added more information to these below.

### *Profiling and preferences*

We sometimes make decisions about what your interests are based on the way that you interact with us and buy products from our cash and carry or website or what you list as your business type. For example Retail Florist, Wedding florist etc. this is called profiling. For example, if you regularly buy the same rose for a wedding or choose a particular foliage everytime you order, then we might use this information to improve your online experience by highlighting certain features on the website for you, so you don't need to. Understanding your preferences and personalising your experience in this way allows us to deliver a better online/cash and carry experience.

## Direct marketing

In addition to sending you information about the products you use (product communications) and in-life communications while you stay with us, where we have your permission we may send you direct marketing communications about our products, services, events and offers, as well as those of our commercial partners that we think you'll be interested in.

Direct marketing communications may be sent by post, email, telephone, SMS and MMS, through social media (such as Whatsapp, Instagram, Twitter, and Facebook), messages including push notifications to your mobile devices, and via other electronic means such as when you visit our websites or use our apps.

We may send you direct marketing while you have an ongoing relationship with us and for a reasonable time after you have used one of our products or services.

You will be able to opt-out of direct marketing by following the instructions in the communications you receive or changing your device settings. You can also request to opt out by emailing us on [info@flowervision.co.uk](mailto:info@flowervision.co.uk) to request to opt out of one or all of our marketing/communication tools.

## *Product related communications and in-life updates*

We may use your information to send you newsletters, bulletins, and other in-life communications, and triggered communications where you make changes to your account or other information about products and services you have signed up for.

For example, we may send you email or text messages or WhatsApp about new seasonal products to help you plan what to purchase and give you the latest seasonal information. You'll be able to opt-out of these.

Service communications will be sent to you regarding products and services you interact with. These are important messages relating to the products and services we provide to you.

## Analysis and product development

We may use your information to improve the products and services we offer. For example, we may look at the preferences of our clients when they purchase products with us to offer more relevant personalisation to customers.

## Detecting ad blockers

When you visit our websites we may check (by using script, code, cookies or other technical means) if you are using ad-blocker or other privacy tools. If we do detect one of these tools, we may ask you or ask your browser to ask you, if you would give us permission to ignore those settings and continue to serve adverts and/or collect your information using cookies and similar technologies.

Information about your device and use of ad blockers may be stored or associated with your device and used to reinsert adverts and to understand how ad blockers and other privacy tools are being used by our visitors.

#### [Linked services, third party sites and content](#)

Our website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Policy. Please note that we are not responsible for the collection, use, maintenance, sharing or disclosure of data and information by such parties. We do not accept any responsibility or liability for other sites' privacy policies. If you access other websites using the links provided, we encourage you to read the privacy policies of websites you visit before submitting any personal information.

#### [Protection of personal data](#)

Flowervision strive to protect the privacy of the information that you share with us. We have undertaken reasonable efforts to implement security measures designed to protect all data we collect against unauthorised access. We utilise the industry standard security measures available through your browser, so that it is unlikely that your information can be read as it travels over the Internet.

Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, although we strive to protect your information, we cannot ensure or warrant the security of the information that you submit to us via the Site and you do so at your own risk. We also implement measures to protect your personal information off-line.

#### [Identity verification](#)

If we provide a service that is dependent on residency we have an obligation to verify relevant information. Where relevant, we may pass your information to a third party for this purpose.

#### [Payments and credit checks](#)

Your information may be used to take payment for products and services and may be used to verify credit details, relating to payments. Currently, we do take card details over the telephone or you can make payment via bank transfers.

#### [Disclosures required by law](#)

Your information will be disclosed where we are obliged by law to do so. We may also disclose your information where we are allowed by law to protect or enforce our rights or the rights of others and for the detection and prevention of crimes, such as fraud.

## Acceptable usage

If you post or send offensive or inappropriate content anywhere on or to any of our websites or apps, or otherwise engage in disruptive behavior on any of our websites or within the cash and carry, we may use the information that is available to us about you to stop such behavior. This may involve responding to or informing relevant third parties and law enforcement agencies about the content and your behavior.

## Data Transfers

When you complete our registration forms or use our services, we may transfer your information to our processors – For example but not restricted to this includes our phone system (Swyx Communications), our marketing communication platform (Mailchimp).

When you give us information about other individuals, you confirm that you have authority to act for them and have made them aware of the potential transfer of their information.

## Training and quality

If you contact us by phone or on chat the conversation may be recorded and listened to for training and quality purposes.

## Social media login

Our websites and apps provide plug-ins to social media websites, including Facebook, Twitter, WhatsApp and Instagram.

If you make use of, or log-in to, the social media features on our websites or apps, we may (depending on your privacy settings) access, use and store information about you, including, but not limited to: your name, e-mail address, gender, location, profile, picture, contacts, and any other information you have chosen to make available.

To find out more about the reasons and extent to which social media sites collect and process your data, or to change your privacy settings, please refer to your social media provider's privacy policy.

## How we share your personal information

Where you provide your information to us we may share it with our group companies, advertising networks and partners.

What sharing takes place will depend on the activity that your information is being used for. Your information will only be shared and used in accordance with this Policy and where an agreement is in place to ensure that your information is protected. We won't sell your personal information without your consent

### *1. Sharing with advertising partners*

When you visit our websites or apps we may pass information about you and any devices you are using to our advertising network partners to enable them to deliver relevant adverts and tell advertisers that adverts have been delivered and seen.

### *2. Sale of our business*

If we restructure or sell all or part of our business or business operations, we may transfer your information as part of that activity, including, but not limited to, where we transfer or cease to manage (or license the use of a brand) at Flowervision. Where this is the case your information will be used in accordance with this Policy unless you are notified otherwise.

## Access and Control

### *1. Updating your information*

If you have an online account with us, please ensure that the information within the client settings page is correct (e.g. any contact information) and that you review and notify us of changes so we can update it .

### *2. Controlling direct marketing*

A customer may allow Flowervision Ltd to provide them with information about products and the service that Flowervision Ltd offers, or third parties that Flowervision have selected, which may be of interest to them. Flowervision will only do this where a customer has agreed to receive such information. You agree to receive marketing information:

- From Flowervision about our products and services by choosing to opt-in on our registration form for a Flowervision account.
- Through contacting Flowervision Ltd and asking us to be added to one of our marketing platforms.

### *3. Controlling other communications*

You can control the communications you receive from us, such as product/service related communications, by following the instructions in any relevant communication or by contacting us to remove you from a particular type of communication. You can either request to be removed by calling us or emailing [info@flowervision.co.uk](mailto:info@flowervision.co.uk).

## **Audience Insights**

If you would prefer not to have your information used for data matching purposes you can contact us using the details below.

### **1. Requesting copies of your information**



You may request a copy of your personal information which we may hold about you. You may also ask us to correct any such personal information which you think is incorrect and incomplete. This right may be restricted by law where disclosing information may result in the personal information of other individuals being disclosed and it would be unreasonable to do so.

## **2. Withdrawing consent**

Where we may rely on consent to use your information, you have the right to withdraw that consent for that processing activity at any time. However, we may have the right to rely on an alternative legal basis for the processing activity and will inform you of that.

If you do withdraw consent we may not be able to provide you with the product or service you have requested.

### Rights in relation to your information

#### *1. Your rights*

Under GDPR, you may have the right to object, erase, or restrict our processing of your information - for example, where we process your personal information because this is in our legitimate interests, you may object to this. We will carefully consider your request as there may be circumstances which require us to, or allow us to, continue processing your data.

The request must be in writing and must contain the following:

- Your name and postal address.
- Details of your request.
- Any details which may help us locate the information which is the subject of your request, for example: Your Client Number.

Please send your request to:

Data Protection Officer

Flowervision, Spout Lane, Stanwell Moor, Middlesex, TW196BN

#### *2. Complaining to the regulator*

If you have any comments, concerns or complaints about our usage of your information we would ask that you contact us first, so that we can try and resolve any matter. However, where we are unable to assist, you are able to complain to the Information Commissioner's Office in the United Kingdom or the data protection regulator in your country of residence, who will be able to liaise with the UK Information Commissioner in the UK.

### *3. Retention of your information*

We will retain your information for as long as necessary for the uses set out in this Policy or while there is a legitimate business reason for doing so. We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed. If you ask us to delete your information before this time, we may not be able to do so for technical, legal, regulatory or contractual constraints. For example, where you wish to be suppressed from direct marketing, we would need to retain your information for this purpose.

Where you ask for your account to be closed, we will do this as soon as possible subject to any terms and conditions relating to the account. Your information will be retained in order to comply with legal and regulatory obligations as well as for analysis, to prevent fraud, collect any monies owed, and to resolve disputes.

We are obligated to store full invoice data for 7 years due to HMRC requirements.

### *Cookies and similar technologies*

#### **Introduction**

We use cookies to help improve our websites in a variety of different ways. Including collecting contextual information about your visit to the site to enhance functionality and user experience.

#### **What are cookies?**

Cookies are small text files placed on your devices when you visit websites via internet browsers. Our use of cookies is to primarily help enhance your user experience and improve the efficiency of our website. In order to make purchases on our website and for an optimal user experience, you will need to enable cookies.

#### **What cookies do we use?**

##### **1. Essential cookies**

These make our websites work. They remember that you are logged in to your account. They also allow us to collect information about your use of our websites and apps, enabling us to improve the way they work. Analytics cookies also allow us to see if there are any technical issues on our websites and if you are experiencing any issues using our websites. They also allow us to look at usage statistics and performance.

We use Google Analytics to help us understand how you use our services. For more information on Google Analytics, please visit [Google's website](#).

##### **2. Functional cookies**

These cookies collect information about the language you have requested the site display content in, remembering your username so you can log-in more quickly, text size, location you are in and generally allow us to customise your experience. Nobody likes having to repeat themselves and these cookies help with that.

- Cookie list: Session; cart; cwn

### **3. Tracking and advertising cookies and similar technologies**

We use these types of cookies and similar technologies to provide adverts that we think may be more relevant to your interests. This can be based on your browsing activity and is known as Online Behavioural Advertising or OBA. Cookies are placed on your browser, which remembers what websites you've been to. Advertising based on what you have been viewing is then displayed.

### **4. Web beacons and tracking pixels**

These technologies help us to count users on a web page, and see if a cookie has been activated. They allow us to see how popular content is and if an email has been delivered to a recipient, opened and links clicked on. We use this information to track how successful campaigns have been.

### **5. Flash cookies**

Sometimes we may use flash players to deliver special content, such as video clips. This uses Local Shared Objects or flash cookies to remember settings.

### **6. Device Fingerprinting**

Sometimes we may use a device's browser information to identify that device, conduct analysis, help detect and prevent fraud and present content correctly.

### **What other purposes do cookies and similar technologies are used for:**

- Allow you access to our websites;
- Permit your internet connection to our websites;
- Allow our servers to record information about your device (such as IP address, browser type, location, hardware and software information);
- Collect unique device identifier (UDID), geo-location and other transactional data to validate free trials when you use a mobile device;
- Assess content usage;
- Provide relevant content;
- Sell third party advertising and enable frequency capping;

### **Managing cookies**

You can change your cookie settings very easily in your browser settings. However, you need to be careful about restricting the use of cookies, as they may prevent the websites you visit from working as they were intended.

## **How to delete cookies?**

Deleting your cookie settings is also relatively easy but the process does differ between browsers. Here's how to delete cookies in the most popular browsers.

You can find this and further information about cookies at <http://www.aboutcookies.org>

You can also control which companies set cookies on your devices by visiting the following pages. Please note that you will need to turn off any ad blockers or privacy tools to see what cookies are being set:

### **1. Internet Advertising Bureau (IAB)**

[Your Online Choices](#) is an industry programme that allows you to control which companies can set cookies and show you advertising. It provides you an easy way of opting out several advertising networks.

### **2. The Network Advertising Initiative control page**

This control [page](#) also allows you to control OBA from the advertising networks they represent.

### **3. The Digital Advertising Alliance's control page**

This control [page](#) also allows you to control cookies.

It is important to remember that these schemes use cookies to remember that you have opted-out of cookies being placed on your browsers. If you clear your cache, the opt-outs will be forgotten and you will have to opt-out again.

[Changes to our Privacy and Cookie Policy](#)

From time to time we may make changes to this Policy. This might be in relation to changes in the law, best practice, changes to the services we provide or collection and use of your personal information. We will always display clearly when the Policy was last updated and where appropriate, notify you of any relevant changes.

[Apps](#)

By downloading our apps, we will require access to the following services on your device: UDID, MAC address, or other applicable device identifier and location. Other services may also be required in order for the apps to function. This information may be used to validate credentials and provide push notifications to your devices.

## Human Resources (HR) Privacy Policy

As part of any recruitment process, Flowervision Ltd collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### **What information do we collect?**

Flowervision collect a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration.
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process; and
- Information about your entitlement to work in the UK.
- Information about Next of kin/emergency contact details in the case you have an accident.
- Information of References for previous employment
- Driving License Information – check your endorsements or disqualifications.
- Training Records
- Records relating to Holiday and Sickness
- Company Phone communications/Expenses

Flowervision may collect this information in a variety of ways. For example, data might be contained in application forms, CVs, info obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why do Flowervision Ltd process personal data?**

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

Flowervision has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide

to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

If your application is unsuccessful, Flowervision may keep your personal data on file in case there are future employment opportunities for which you may be suited. We may ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks, and pension/insurance providers, HMRC, HM Government, lawyers, accountants, auditors or any other legitimate businesses requiring your data.

### **How do Flowervision protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long do Flowervision Ltd keep data?**

If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 (six) months for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

After employment, your data may be kept up to 7 years on our systems.

### **Your rights**

As a data subject, you have a number of rights.

You can request a copy of your data by alerting management if you;

- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where Flowervision is relying on its legitimate interests as the legal ground for processing.

You can exercise those rights at any time.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to Flowervision Ltd during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

### Contact

If you would like request information about the data we hold about you personally then get in touch with us on:

- By Email: [info@flowervision.co.uk](mailto:info@flowervision.co.uk)
- By Post: The Data Protection Officer, Flowervision Ltd, Stanwell Moor, Middlesex, TW196BN

### Last updated

This policy was last updated on 25<sup>th</sup> May 2018