

Privacy Policy

About this policy

This policy describes how we use your personal data when you use our website www.libradrinks.co.uk or buy our goods, or when we provide services to you. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

You can read, print and save this whole policy or click on the links below to see specific information about:

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Libra Drinks Wholesale Ltd

Who we are and how you can contact us

We are Libra Drinks Wholesale Ltd, a limited company, registration number 05477707. Our registered office address is Lifford Hall, Lifford Lane, Kings Norton, Birmingham, B30 3JN.

You can contact us in writing at the address given above or at our trading address: Unit 2 Finch Close, Lenton Industrial Estate, Nottingham, NG7 2NN or by emailing admin@libradrinks.co.uk. If you would like to speak to us, please call us on 0845 130 1623.

Please refer to the sections on [Your rights to know what personal data we hold and to control how we use it](#) and [How to make a complaint](#) for further contact information.

What personal data we collect about you

We collect:

- **personal data that you provide to us.** There are lots of ways in which you may share your personal data with us, for example, you may telephone the office (all calls are recorded), register on our website, post on social media sites that we run or contact us in connection with goods or services that you would like to buy, or have already bought, from us. The personal data that you provide to us may include your name, address, e-mail address and phone number, financial and credit card information.
- **personal data that we receive from third parties.** If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may have your name and contact details passed to us by a drinks supplier that refers you to us so that we can provide your with our goods or services, or from a customer to whom we already provide goods or services.
- **personal data about your use of our website.** Technical information that may be obtained when logging into our website, such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and where you went when you left, what pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs), is not stored or used in any way, does not identify any individual, and is not classed as personal data.

What we use your personal data for

We use your personal data in the following ways:

- **personal data that you provide to us** is used to:

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- process and respond to any enquiry you make
- provide you with the information, products and services that you request from us
- provide you with marketing information in accordance with your marketing preferences (see [How we use your personal data for marketing](#))
- manage and administer our, and your, business. This may include, where necessary, sharing personal data with third parties. Third parties include, but are not limited to, suppliers of drinks and snacks and other bar products, already known to us and trading with us.
- review and improve our goods and service
- **personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.
- **personal data about your use of our website** is used to:
 - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device
 - as part of our efforts to keep our site safe and secure
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website, and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#) at www.libradrinks.co.uk

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When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights
- we have a legal obligation to do so

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

Please refer to the section on [How we use your personal data for marketing](#) to read about marketing consents.

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our goods or services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "**Subject Access Request**" and send it to us by post or email using the details in the [Who we are and how you can contact us](#) section.

You also have rights to:

- prevent your personal data being used for marketing purposes (see [How we use your personal data for marketing](#) for further details)
- have inaccurate personal data corrected, blocked or erased

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- object to decisions being made about you by automated means [or to your personal data being used for profiling purposes]
- object to our using your personal data in ways that are likely to cause you damage or distress
- restrict our use of your personal data
- require that we delete your personal data
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file

You can find full details of your personal data rights on the Information Commissioner's Office website at www.ico.org.uk.

Automated decision making and profiling

We do not make use of automated decision making or profiling.

When we will share your personal data with others

We share your data with the following people in the day to day running our business:

- any business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from
- if you have made a cash purchase we may have to share your personal data with HMRC as part of our money laundering compliance obligations
- analytics and search engine providers that assist us in the improvement and optimisation of our site

We may also share your personal information with third parties on a one-off basis, for example, if:

- we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions of supply of goods and services (see www.libradrinks.co.uk) and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

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- In order to process your application we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an on-going basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers
- ensuring that our staff have access to regular data security awareness training
- keeping paper records to a minimum and ensuring that those we do have are stored in lockable filing cabinets on our office premises
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems
- enforcing a strict policy on the use of mobile devices and out of office working

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. Please do not share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

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- you make an enquiry about our goods or services
- you buy our goods or services
- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services
- you have registered an account on our website and have indicated during the sign-up process that you are happy to receive marketing communications

We may send you marketing communications by email, telephone, automated calls, text message, post.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects, or you may ask us not to send you any marketing communications at all.

You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the [Who we are and how you can contact us](#) section above.

We never share your personal data with third parties for marketing purposes.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

The data below shows what safeguards are in place in respect of personal data we currently transfer outside of the EU

| Description of supplier | Reason for transfer | Destination to which data is transferred | Safeguards implemented |
|--------------------------------|--|---|--|
| Mailchimp | For automated distribution of marketing communications by email. | USA | Registered with the EU – US Privacy Shield |

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|---------|----------------------------------|-----|--|
| DropBox | For cloud-based document storage | USA | Registered with the EU – US Privacy Shield |
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How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- your name and contact details for at least 6 years after cessation of trade to comply with legislation, or indefinitely whilst supply of goods or services continues
- a record of the goods and services (including a copy of your full customer file) we provide to you for at least 6 years
- if we have collected your details as part of our money laundering compliance obligations, we will retain that information for at least 6 years
- complaint records for 6 years

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

Data deleted or discarded is done so in a controlled and secure manner by competent individuals or companies.

How you can make a complaint

If you are unhappy with the way we have used your personal data, please contact us to discuss this using the contact details set out in the [Who we are and how you can contact us](#) section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website, www.libradrinks.co.uk or you can contact us [Who we are and how you can contact us](#) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.

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This is policy version 1 which came into effect on 14/05/2018.