



# Privacy Policy

Welcome to the Yareal UK's privacy policy.

## Purpose of this privacy policy

Yareal UK is committed to protecting your personal data.

This policy tells you about how Yareal UK collects and processes your personal data through your use of this website, including any data you may provide when you purchase a product or service. It also tells you about your privacy rights and how the law protects you.

This website is not intended for children under 16 and we do not knowingly collect such data relating to anyone below that age.

It is important that you read this privacy policy together with any other privacy policy or 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 policy supplements other notices and privacy policies and is not intended to override them.

## Controller

Yareal UK Limited and its two subsidiaries Yareal Humby Limited and Yareal Llanforda Limited make up the Yareal UK Group. Llanforda Sporting Agency is a trading name of Yareal Llanforda Limited. This privacy policy is issued on behalf of the Yareal UK Group so when we mention Yareal UK, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Yareal UK Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Yareal UK is the controller and responsible for this website.

## Contact details

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

Full name of legal entity: Yareal UK Limited

Email address: info@yareal.co.uk

Postal address: Belgrave Place, 17 Salop Road, Oswestry, Shropshire, SY11 2NR

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 10/03/23.

We may need to update our privacy policy from time to time, for example, to take account of modifications to our website, products or services or if there are changes to the law. We would therefore remind you to check that you have seen the latest version.

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.

### **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 policy of every website you visit.

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

Personal data, or personal information, 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).

We collect personal information about you to inform you about us and our products or services, to deal with any enquiries you may have and to improve and develop our products and services and our site.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes 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 could be derived from your personal data but is not considered personal data in law as this data will **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 policy.

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.

### **If you fail to provide personal data**

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.

## **2. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns from analytics providers such as Google, advertising networks and search information providers. We collect this personal data by using cookies and other similar technologies.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources such as Companies House.

## **3. 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 it is necessary for our legitimate interests (or those of a third party) of being able to manage and operate our business and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

In certain circumstances, we may also obtain your consent to use your personal data for a particular purpose such as contacting third parties on your behalf.

Please look at the section headed 'Glossary' below to find out more about the types of lawful basis that we will rely on to process your personal data.

### **Purposes for which we will use your personal data**

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.

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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (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	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (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, data	(a) Identity	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT

analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (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	(a) Technical (b) Usage	Necessary for our legitimate interests (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	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

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 if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time 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 or product/service experience.

### **Cookies**

Cookies are small text files sent by us to your computer, or from your computer or mobile device to us each time you visit our website. They are unique to you or your web browser. When you visit the website again the cookie allows the site to recognise your browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them, or until they expire.

Cookies do lots of different jobs. They are widely used by owners of sites in order to make websites work, or work more efficiently. They cannot be used to identify you personally.

The Yareal UK website ([yareal.co.uk](http://yareal.co.uk)) and the Llanforda Sporting Agency website ([llanforda.co.uk](http://llanforda.co.uk)) use cookies to record log data. We use both session-based and persistent cookies, dependent upon how you use or interact with our websites.

We don't use non-essential tracker cookies. The cookies we use are not specific to your account but are unique and allow us to undertake website analytics and customization, among other similar things. You can choose not to store cookies by changing your browser settings. If you decide to disable some or all cookies, you may not be able to use some of the functions on our website. We may use third-party cookies, for example Google Analytics, and you may choose to opt-out of third-party cookies from their website.

### **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.

## **4. Disclosures of your personal data**

We may share your personal data with certain third parties as described below.

- We may occasionally have to share Identity, Contact, Financial and Transaction with other companies in the Yareal Group for administrative purposes.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

- Law enforcement, regulators and other public authorities who require access to personal data in accordance with the law.
- 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 policy.
- Third parties who we notify you about from time to time
- Third parties who process personal data on our behalf such as data hosting providers, payment processors or software developers (called data 'processors').

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 'processors' 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.

## 5. **International transfers**

We do not transfer the personal data that we collect outside the UK or the European Union/European Economic Area.

## 6. **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.

## 7. **Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see the section headed 'Your legal rights' below for further information.

In some circumstances we will 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.

## 8. **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows:

- Right to request access to your personal data (commonly known as a "data subject access request").
- Right to request correction of your personal data
- Right to request erasure of your personal data where there is no good reason for us continuing to process it
- Right to object to processing of your personal data for marketing purposes or where we are relying on a legitimate interest (or those of a third party) to process it
- Right to request restriction of processing your personal data in certain circumstances such as where you want us to check its accuracy
- Right to request transfer of your personal data to you or to a third party
- Right to withdraw consent, where we are relying on consent to process your personal data

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other 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 to clarify your request.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9. **Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest 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.

**Performance of Contract** means processing your data where 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.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.