# **Privacy Notice**

JVF group of companies (JVF) including JVF Communications Ltd and JVF Systems Ltd, registered address The Point Granite Way Mountsorrel LE12 7TZ collect and process personal data in accordance with the provisions of the UK General Data Protection Regulation ("UK GDPR") and any other applicable local laws and regulations such as the EU General Data Protection Regulation (Regulation (EU) No. 2016/679.

### INFORMATION WE COLLECT

- 1) personal data that you have voluntarily shared with us
- 2) data concerning your activity on the Website

#### HOW DO WE USE YOUR DATA

We use your personal data to provide you with the services requested, including but not limited to, allowing you to surf through the Website, respond to requests and to interact with our services.

### ON WHAT GROUND DO WE USE YOUR DATA

We use your data to allow you to use the Website and the relevant services.

### FOR HOW LONG WE RETAIN YOUR DATA

We use your personal data for the period strictly necessary to achieve the intended purposes.

## WHAT WE DO TO PROTECT YOUR DATA

We have implemented adequate administrative, technical and physical measures designed to safeguard your personal data against loss, theft and unauthorized use, disclosure or modification.

## WITH WHOM DO WE SHARE YOUR DATA

We do not share your data with anyone other than the Data Controller (if applicable)

### TRANSFERS OF YOUR DATA OUTSIDE EEA

We do not transfer your data outside European Economic Area (EEA)

#### YOUR RIGHTS

You have among others the right to access, integrate, update, amend and delete your personal data.

CONTACT US You can contact us by sending us an email at data\_protection@jvf.co.uk. We may modify or update this Privacy Notice also in order to comply with applicable laws.

#### 1. TYPE OF PERSONAL DATA PROCESSED

JVF will process the following categories of data:

## Data relating to you

JVF processes personal data about you collected or provided in the online shop, such as name, surname, address of residence, email, telephone number.

Such data is processed only to the extent that it is necessary to pursue the purposes set out in this Privacy Notice.

### Browsing data

The Website collects personal data of the Users for technical and functioning reasons. Such data is not collected for the purpose of identifying the User, but it may imply the identification of the same should, for instance, the data be compared to other data held by third parties. Such category of data includes the IP address and the domain name of the User's computer, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received as reply, the numerical code related to the reply status from the server and other parameters related to the operating system used by the User's device. Such data is used only to collect anonymous statistical information on the use of the Website and to control its correct operation and it is retained in accordance with our records retention requirements. Such data may be used for ascertaining liability in the event of possible computer-related crimes against the Website.

### 2. PURPOSES OF THE PROCESSING

Where applicable, we will process your personal data we have collected or been provided with for the following purposes:

- a) allowing you to register on the Website by opening a personal account, to purchase a product on the Website;
- b) completing the online purchase of the product and providing additional services (after-sale services, the prevention of fraud, the management of returns);
- c) performing the home delivery of our products and providing you with any requested services;
- d) complying with the statutory provisions and regulations and enforcing our own rights before the courts;

## 3. LEGAL BASIS FOR THE PROCESSING

The provision of the personal data for the purposes under Section 2, is necessary for the purpose the data was provided or shared with us which includes but is not limited the registration on the Website, the online purchase of products

The provision of personal data for the purposes under Section 2, para. d) is mandatory since required by the applicable laws;

### 4. DATA RETENTION

JVF will process the personal data for as long as it is necessary to achieve the intended purposes pursuant to Section 2 above. In any case, the following retention periods shall apply:

the data collected for the purposes of Section 2, will be retained for the period strictly necessary in order to respond to data subjects' requests and comply with applicable laws and regulations; the data collected for the purpose of Section 2, para. d) will be retained for the period mandatorily prescribed by the applicable law provisions

#### 5. DATA PROCESSING PROCEDURES

Your personal data is processed with the support of Information Technology and/or paper means and it is protected by appropriate security devices suitable to ensure the secrecy and safety of the personal data. In particular, JVF adopts the appropriate administrative, technical, personal and physical measures designed to safeguard the personal data held against any loss, theft as well as unauthorised use, disclosure or change in the personal data.

### 6. COMMUNICATION OF DATA

We will not share your personal data other than with the relevant Data Controller

### 7. MINORS UNDER THE AGE OF 18

The Website does not address subjects under the age of 18, nor is JVF knowingly collecting personal data from people under the age of 18.

#### 8. RIGHTS OF DATA SUBJECTS

You, at any time and at no charge, can have and/or exercise the following rights:

the right to be informed on the purposes and methods of the processing of your personal data;

the right of access to your personal data (commonly known as "data subject access request"). This enables you to receive a copy of the personal data we hold about you;

the right to ask for updating or rectification of the personal data 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;

the right to request erasure of your personal data. This enables you to ask us to delete or remove your 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 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;

the right to restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

the right to object to the processing, wholly or partly, of your personal data where we are relying on 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

where we are relying on consent to process your personal data, the right to revoke the consent to the processing of your personal data freely and at any time;

the right to data portability of your personal data to you or to a different provider. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format;

the right to contact us by sending us an email at data\_protection@jvf.co.uk and

the right to lodge a complaint in front of the competent national data protection or judicial authority.

If you wish to exercise the rights mentioned above, or raise any questions about the personal data we hold about you, please send us an email at data\_protection@jvf.co.uk or write to us at: JVF, 76 Leicester Road, Mountsorrel, LE12 7AN, for the attention of the Data Protection Office.

## 9. DATA PROCESSOR

The GDPR makes a distinction between organisations that process personal data for their own purposes, known as 'Data Controllers', and organisations that process personal data on behalf of other organisations, known as 'Data Processors'. JVF is a Data Processor, registered in England, with a registration address of The Point Granite Way Mountsorrel LE12 7TZ

## 10. AMENDMENTS AND UPDATES

We keep this Privacy Notice under regular review. This Privacy Notice was last updated in January 2024.