

Privacy Policy

PLUCK ENTERPRISES LTD: Privacy Notice

PLUCK ENTERPRISES LTD trading as “Alan Entwistle Guitars”(we, us, are) is responsible for and committed to protecting the privacy and security of your personal data. This Privacy Notice describes how we collect, use and look after your personal data when you make a purchase from our stores or using our website, establish a customer account with us or register to receive our newsletters. It also tells you about your rights and how the law protects you.

Important information

This Privacy Notice supplements other notices on our website (including our Terms and Conditions) and is not intended to override them. Our website should not be used by children.

To assist you in understanding this Privacy Notice, we have set out in the Schedule examples of types of personal data we collect, how we use it, the lawful basis for processing such data, further details of your rights and a glossary of terms used.

We have appointed a Data Protection Manager (**DPM**). If you have any questions about this Privacy Notice, or wish to raise any requests to exercise your legal rights, please contact our DPM in writing, either:

by email to: info@alanentwistleguitars.co.uk

by post to: Data Protection Manager, PLUCK ENTERPRISES LTD, 35 Heol Penycae, Port Talbot, SA13 2EP

You have the right to make a complaint at any time to the ICO (www.ico.org.uk) and to seek judicial remedies. We would, however, appreciate the chance to deal with any concerns you have before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

It is important that the data we hold about you is accurate and current, therefore please keep us informed of any changes to your personal data.

Third-party links

Our stores and website offer links to third-party websites, plug-ins and applications such as links to portals operated by finance providers. By accessing such third-party applications, you may enable the relevant third parties to collect or share your personal data. We do not control these third-party websites, plug in or applications and, therefore, you should also read their privacy notices to understand what personal data they collect about you and how it will be used.

The data we collect about you

We may collect, use, store and transfer the types of personal data about you listed in the Schedule: Part 1. We require your personal data to enter into the terms of a contract with you. If you fail to provide it, we may not be able to enter into or perform the contract and may have to cancel the contract. We will notify you of this at the relevant time.

How personal data is collected

We collect personal data in the following ways:

Directly from you	You may provide personal data when you provide information to our store personnel during or an instore transaction, when you open an account with us or make a purchase - on our website or by email/over the telephone. You may also provide personal data: to our customer services team in relation to, for example, delivery and returns; when you complete online forms; request products or services or otherwise correspond with us (by post, phone or email).
Retail Partners	We may collect personal data from Amazon or other similar on-line retailers in the context of you making a purchase.
Third parties	We may receive personal data from: (a) analytics providers based outside the EU (such as Google); (b) search information providers based inside and outside the EU; (c) our suppliers, such as payment providers, delivery services, website support and maintenance providers.
Automated technology	We automatically collect technical personal data when you browse or interact with our website, by using cookies, and other similar technologies. We may also receive technical data about you if you visit other websites which use our cookies. Please see our cookie notice for further details.

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:

- to perform the contract, we are to enter into or have entered into with you;
- to comply with a legal obligation; or
- where it is necessary and in our legitimate interests (or those of a third party) and your interests and rights do not override those interests.

The Schedule: Part 2 sets out the situations in which we process personal data about you and the corresponding legal basis or legitimate interests. We may process your personal data based on more than one lawful ground depending on the specific purpose for which we are using your information.

Change of purpose

We will only use your personal data for the purpose that we originally 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 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 use your personal data in this manner.

We may process your personal data (without your knowledge or consent) where this is required or permitted by law.

Marketing Communications

We rely on your consent as a legal basis for processing your personal data only in relation to sending marketing communications to you, i.e. our newsletters. You have the right to withdraw your consent to marketing communication at any time by either:

- when activated, updating your newsletter preferences in the Account section. Our Customer Services team will be able to provide guidance on how to do this if required.
- When the newsletter link is active, using the unsubscribe link in the newsletter

Disclosure of personal data to third parties

For the purposes of providing services to you (for example, to arrange delivery of your purchases) we may share your personal data with third parties, further details of which are set out in the Schedule: Part 3. We do not allow our third-party service providers to use your personal data for their own purposes. They can only process your personal data for specified purposes and in accordance with our instructions. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Our third-party service providers, for example IT service providers, may process personal data outside of the EEA; we agree appropriate contractual terms with such parties to ensure that your data is processed in accordance with the principles of EU and UK law.

We do not control third party websites or portals such as those operated by finance partners and you should read their privacy notices to understand how they will use your personal data.

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. We also limit access to your personal data to those employees and persons who have a business need to know and they only process your personal data on our instructions and subject to a duty of confidentiality.

We have procedures in place 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.

Data retention

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us. For legal reasons we keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers.

Your legal rights

You have certain rights in relation to your personal data. These are set out in the Schedule: Part 4. If you wish to exercise any of your rights, please contact our DPM.

You will not have to pay a fee to exercise any of your rights. However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee for this information or refuse to comply with your request.

We may request specific information from you to help us confirm your identity when you contact us. This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it.

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

This policy was last updated in May 2018

Schedule 1

Part 1 - Types of personal data

Contact data	billing address, delivery address, email address and telephone number
Financial data	bank account and payment card details
Identity data	first name, last name
Marketing and Communications Data	your preferences in receiving marketing communications from us
Profile data	your password, preferences, feedback
Technical data	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 our website

Transaction data

includes details about payments to and from you and other details of products and services you have purchased from us.

Part 2 - Lawful basis for processing and processing activities

Set out below are specific details of the processing activities we undertake with your personal data and the lawful basis for doing this.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	identity, contact	to perform our contract with you.
To process and deliver your order, manage payments	identity, contact, financial, transaction	(i) to perform our contract with you; (ii) as necessary for our legitimate interest in maintaining appropriate levels of customer service.
To manage our relationship with you, notifying you about changes to our Terms and Conditions or Privacy Notice	identity, contact, profile	(i) to perform our contract with you; (ii) as necessary to comply with a legal obligation; (iii) as necessary for our legitimate interests in keeping our records updated and in maintaining appropriate levels of customer service.
To send to you marketing communications (including newsletters)	identity, contact, marketing and communications	as necessary for our legitimate interest in promoting our products and services in accordance with your preferences.
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	identity, contact, technical	(i) as necessary for our legitimate interests in 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; (ii) as necessary to comply with any legal obligations.
To deliver relevant website content to you and measure or understand the effectiveness of our	identity, contact, profile, technical	as necessary for our legitimate interests in promoting the effectiveness of our website and marketing activities.

content		
To use data analytics to improve our website, products/services, customer relationships and experiences	technical	as necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated, relevant, and effective.

Part 3 - Third Parties

Service providers	acting as processors or controllers who provide IT and system hosting and administration services, finance providers, logistics and delivery services, suppliers, for the purposes of marketing communications and customer satisfaction surveys. If you require further information about third parties with which your personal data may be shared, please contact us.
Professional advisors	acting as processors or controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
HM Revenue & Customs, trading standards, regulators and other authorities (including the police)	acting as processors or controllers who require reporting of processing activities in certain circumstances, including where we are required by law or for the purposes of preventing crime or fraud.
Third parties	third parties whom we may choose to sell, transfer, or merge parts of our business or our assets. 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.

Part 4 - Your legal rights

You have the following legal rights in relation to your personal data:

Access your data	You can ask for access to and a copy of your personal data and can check we are lawfully processing it.
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Correction	You can ask us to correct any incomplete or inaccurate personal data we hold about you.
Erasure	<p>You can ask us to delete or remove your personal data where:</p> <p>(a) there is no good reason for us continuing to process it; (b) you have successfully exercised your right to object (see below); (c) we may have processed your information unlawfully; or (d) we are required to erase your personal data to comply with local law.</p> <p>We may not always be able to comply with your request for specific legal reasons, which will be notified to you at the time of your request.</p>
Object	<p>You can object to the processing of your personal data where:</p> <p>(a) where we are relying on our legitimate interest (or those of a third party) as the basis for processing your personal data, if you feel it impacts on your fundamental rights and freedoms; or (b) where we are processing your personal data for direct marketing purposes.</p> <p>In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms, and, in such circumstances, we can continue to process your personal data for such purposes.</p>
Restrict processing	<p>You can ask us to us to suspend or restrict the processing of your personal data, if:</p> <p>(a) you want us to establish the accuracy of your personal data; (b) our use of your personal data is unlawful, but you do not want us to erase it; (c) you need us to hold your personal data (where 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 personal data, but we need to verify whether we have overriding legitimate grounds to use it.</p>
Request a transfer	In limited circumstances you can request a transfer of your personal data which is held in an automated manner and which you provided your consent for us to process such personal data or which we need to process to perform our contact with you, to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format.
Withdraw your consent	You can withdraw your consent at any time (where we are relying on consent to process your personal data) e.g. in relation

	to marketing communication. This does not affect the lawfulness of any processing carried out before you withdraw your consent.
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Part 5 - Glossary

controller	a body that determines the purposes and means of processing personal data
data subject	an individual living person identified by personal data (you)
personal data	information identifying a data subject from that data alone or with other data we may hold
processor	a body that is responsible for processing personal data on behalf of a controller.
ICO	Information Commissioner's Office, the UK's supervisory authority for data protection issues.

Cookies

Like many online retailers and other websites, we use to facilitate your navigation through the website

By visiting our site with your browser settings adjusted to accept cookies tells us that you want to use our products and services and that you consent to the use of cookies and other technologies to provide them to you as described below.

WHAT ARE COOKIES?

Cookies are small text files that are placed on your computer, mobile device or tablet by certain web pages that you visit. We use cookies to allow you to use various features of the website, such as adding items to your basket, displaying personal recommendations and checking out. If you wish to purchase items from our website, you will need to have cookies enabled.

Cookies do not harm your computer nor do any of our cookies store any credit/debit card information or password details. We don't store personally identifiable information such as address details in the cookies we create, but we do use encrypted information gathered from them to help us to identify and resolve errors.

For more information please see [Google's video about cookies](#).

HOW WE USE COOKIES

We use cookies to enhance your browsing experience and to enable functionality such as:

- 'Remembering' who you are when you visit our site, for example preferences that you may have set. Again, this is not personally identifiable
- Enabling you to log-in, add items to your basket and check out
- Displaying items relevant to you, based on your browsing history
- Enhancing the customer journey through the use of Google Analytics. See Google's privacy policy [here](#)

THIRD PARTY COOKIES (“RETARGETING”, “BEHAVIOURAL” OR BANNER ADVERTISING COOKIES)

We also work with carefully selected third party advertising companies who may set cookies on your computer or device during your visit to our website. These advertising companies use the information collected in these cookies so that they can present you with adverts that you may be interested in. These cookies do not collect personally identifying information and the data collected is anonymous.

ADJUSTING YOUR PREFERENCES

Most browsers are automatically set to accept cookies but if you are using Microsoft's Internet Explorer, Google Chrome, Netscape Navigator, you can configure your browser to restrict cookies or block all cookies should you wish.