

# Privacy Notice

John Mackle (Moy) Ltd is the data controller and is responsible for the privacy of your data. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with the Privacy Notice.

Please read our Privacy Notice carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This notice applies to any website which references this Privacy Notice. Where you provide us with your personal information in any of the ways described below, you agree that we may collect, store and use it (a) in order to perform our contractual obligations to you, (b) where we are required to do so by law ( eg a legal obligation or for the detection or prevention of crime (c) based on our legitimate interest for processing or (d) based on your written consent, which you may withdraw at any time, as described in this Privacy Notice.

## About Us

John Mackle (Moy) Ltd is a company incorporated in Northern Ireland (NI 8491) and whose registered address is John Mackle (Moy) Ltd, 40 Corrigan Hill Road, Moy, Dungannon, Co. Tyrone, BT71 6SL.

If you have any queries about how we treat your information, the contents of this notice, your rights under local law, how to update your records or how to obtain a copy of the information we hold about you, please write to our Data Protection Manager at the following registered address: John Mackle (Moy) Ltd, 40 Corrigan Hill Road, Moy, Dungannon, Co. Tyrone, BT71 6SL.

## What information is collected?

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

- **Identity Data** includes [first name, maiden name, last name and username or similar identifier].
- **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 may be derived from your personal data but is not considered personal data in law as this data does **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 notice**.

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.

## How we collect information?

To the extent permissible under applicable law, we collect information about you when you:

- register to use our websites; this may include your name (including business name), address, email address and telephone number.
- place an order using our websites; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- complete online forms, take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws;
- interact with us using social media;
- provide your contact details to us when registering to use or accessing any websites we make available or when you update those details; and
- contact us offline, for example by telephone, email or post.

We also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites (for example, we may collect location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data) and we will ask for your permission before we do so. We may do this using cookies or similar technologies (as described in Cookie section below).

If you intend giving us personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws. In so far as required by applicable data protection laws, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

## How we will use your information

Depending on the reason for holding your data we will use the information we hold for the following purposes:

- To carry out our obligations arising from any contracts entered between you and us and to provide you with the information that you request from us;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- To comply with any legal or regulatory obligation. To monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual.
- To notify you about changes to our service;
- Where relevant, to provide customer support and compliant handling processes;
- From time to time, we may use your information to contact you with marketing details about our products which we feel may be of interest to you.

## Who will it be shared with

Where necessary or where we have the right to do so, we will share your data with the following:

- If we exchange email with you our email system is provided by Microsoft Corporation in the European Union and GreenviewData on behalf of John Mackle (Moy) Ltd. You can view the [GreenviewData Privacy Policy](#) on their website.
- If we send you marketing information your details are processed by “ActiveCampaign, LLC (“ActiveCampaign”)”, in the United States of America on behalf of John Mackle (Moy) Ltd. with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (together “*Privacy Shield*”) with respect to Personal Information we process from the EU or Switzerland and transfer to the United States. You can view the [Active Campaign Privacy Policy on their website](#).
- We will provide aggregate information to our advertisers (e.g. we will inform them that 100 users visited our webpage during a specific date range)

## Other sites and social media

If you follow a link from our website to another site or service, this notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy notices within those sites or services.

## How long we will store your data

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.

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 requirements. OR

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by *writing to our* Data Protection Manager at the following registered address: John Mackle (Moy) Ltd, 40 Corrigan Hill Road, Moy, Dungannon, Co. Tyrone, BT71 6SL.

## **Your information and your rights**

You can ask to see a copy of the information that we hold about you and for corrections to be made to any incorrect information. We want to be as helpful as possible and, in most cases will provide the information within one month of your request. We do not have to provide information in all cases including where it would involve disclosing information about another person or where a request is excessive or manifestly unfounded and may make a charge for providing the information in some cases.

You have the right to request the following information:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information; the right to object to the processing of your information e.g. for direct marketing purposes;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”);
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner’s Office).
- If you request a copy of your information you may be required to pay a statutory fee.
- If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with our Data Retention Policy.

Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

If you wish to exercise any of the rights set out above please write to our Data Protection Manager at the following registered address: John Mackle (Moy) Ltd, 40 Corrigan Hill Road, Moy, Dungannon, Co. Tyrone, BT71 6SL.

## **Changes to our Privacy Notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 1<sup>st</sup> April 2022.

# Cookies, Analytics and Traffic Data

Cookies are small text files which are transferred from our websites and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites which are deleted when you close your browser or leave your session in the application or service) or persistent cookies (cookies which enable our websites to “remember” who you are and to remember your preferences within our websites and which will stay on your computer or device after you close your browser).

We use the following different types of cookies:

**Strictly necessary cookies** These are cookies which are needed for our websites to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

**Performance cookies and analytics technologies** These cookies collect information about how visitors and users use our websites, for instance which functionality visitors use most often, and if they get error messages from areas of the websites. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our websites work.

**Functionality cookies** These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

**Targeting or advertising cookies** These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

**Web beacons and parameter tracking** We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

**IP Address and traffic data** We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information. We also collect some site statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

Find out more about the individual cookies and analytics technologies that we use.

Description	Purpose
Google Analytics	<p>Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the websites. The information generated by the cookie about your use of the websites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the websites compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of this website. By using our websites you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see "How Google uses data when you use our partners' sites or apps", (located at <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>, or any other URL Google may provide from time to time).</p>

How to disable cookies You may be able to configure your browser or our website to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the [www.youronlinechoices.co.ukallaboutcookies.org](http://www.youronlinechoices.co.ukallaboutcookies.org) website.