

PRIVACY NOTICE

INTRODUCTION

Welcome to the Number14 Consulting Ltd (Highland Glow Candle Company - HGCC) privacy notice.

HGCC respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or when you visit any of our stores and tell you about your privacy rights and how the law protects you.

Please also use the Glossary of this notice to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how HGCC collects and processes your personal data through your use of our website, your use of our stores, including any data you may provide when you sign up to our newsletter, purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

CONTROLLER

Number14 Consulting Ltd is the controller and responsible for your personal data (referred to as “HGCC”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

You can contact our Data Privacy Manager at:

Post:

Number14 Consulting Ltd

14 The Logan

Liff

Dundee

DD2 5PJ

FAO: Data Privacy Manager

Email:

support@highlandglow.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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 NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was is applicable from 29/12/2020 and was last updated on 29/12/2020 and historic versions can be obtained by contacting us.

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 notice of every website you visit.

2. 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 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, username or similar identifier, marital status, title, date of birth and gender, emergency contact first name and last name;
- Contact Data includes billing address, delivery address, email address, telephone numbers and emergency contact 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; and
- CCTV Images in our premises, including our stores. We use CCTV to monitor and record images for the purposes of security and health and safety and store the images centrally. HGCC are the controller in respect to CCTV.

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.

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.

3. 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:

- Buy or express an interest in our products or services, in-store or on our website;
- Book a test ride or a service with us;
- Create an account on our website;
- Subscribe to our newsletter;
- Request that we send marketing materials to you;
- Enter a competition, promotion or survey;
- Take part in a HGCC event;
- Submit a product or service review; or
- Communicate with us by Telephone, Email or Webchat.

Automated technologies or interactions. As you interact with our website and emails, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

4. 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 we have your consent;
- 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; or
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to marketing at any time by unsubscribing via the link provided with each marketing email we send to you or by contacting us on support@highlandglow.co.uk

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	(a) 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) (c) Necessary for our legitimate interests (to develop our products/services and grow our business)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (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 an event, 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) (c) Consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for 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) (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	(a) Necessary for our legitimate interests (to develop our products/services and grow our business); or (b) Consent

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 (this is “marketing”).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing. You will also receive marketing communications from us if you have provided us with your details when you entered a competition or registered for a promotion and gave us your consent as part of that process.

THIRD-PARTY MARKETING

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

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us on support@highlandglow.co.uk

Opting out of marketing messages will not prevent you receiving non-marketing messages from us, for example relating to products ordered from us, responses to customer service queries etc.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may not function properly. For more information about the cookies we use, please see the [Cookie Policy](#)

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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

External Third Parties as set out in the Glossary.

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 notice.

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 service providers 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.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside of the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

7. 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.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. We also keep this basic information about our customers for six years following your most recent purchase from us, to enable us to deal efficiently with any after-sales queries that you may have. We keep customer profile information that you have indicated you are happy for us to have in order to keep you up to date regarding our products, services and events and will keep this information until such time as you indicate you no longer wish us to keep this data.

We retain CCTV recordings centrally for up to 30 days, and for a longer period if they are relevant to an incident, complaint, investigation or legal proceedings.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may 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.

9. YOUR LEGAL RIGHTS

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

You have the right to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data; and
- Request transfer of your personal data.

You have the right to opt-out of automated profiling of your personal data and the right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at support@highlandglow.co.uk

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 may 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 in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may 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.

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

Consent means you have explicitly given us permission to process your personal data. In such circumstances we will have asked you a specific question and you will have entered information or ticked a tick-box to indicate your consent.

THIRD PARTIES

EXTERNAL THIRD PARTIES

Service providers acting as processors based in the UK, EU or USA who provide IT, payment processing and system administration services

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK and EU who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Customer service call, email, webchat, display advertising and website behavioural service providers, acting as processors, based in the UK, EU or USA.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that 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.

Request erasure of your personal data. This enables you to ask us to delete or remove 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 (see below), where we may have processed your information unlawfully 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.

Object to processing of your personal data where we are relying on a 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of 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. In such circumstances we may reserve the right to delete your personal data rather than hold it but restrict processing, where our processes are not set up to enable a restriction.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Request to opt out of automated profiling of your personal data. You have the legal right to opt-out of any automated profiling of your personal data that could have a legal consequence for you, and have a human being involved in the processing decision rather than it being automated. The only profiling of this type that we undertake is in our marketing activities, in which we tailor our marketing communications to your transactional history and product preferences. If you wish to opt-out of this automated profiling please contact us, though please be aware that our systems are not configured to send un-tailored marketing communications to

you, so in practice opting out of automated profiling will result in you being opted out of receiving marketing communications from us.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Cookie Policy

What are cookies and other Tracking Technologies and how we use them?

A cookie is a small text file which we transfer to your device through your web browser when you visit our website or open certain emails. Cookies are used on this shopping site to recognise you when you visit our website, keep track of the contents of your shopping cart once you have selected an item, to store delivery addresses when you register, to understand visitor behaviour on our site and to provide relevant and targeted advertising messages to our site visitors. This information can be used to enhance the content of our website and make your use of it easier. Other tracking technologies, like web beacons, clear GIFs, page tags and web bugs, are used to understand how people are using our services and to target advertising.

When you first use our Website, we will ask you to consent to our use of cookies and give you information about them. If you continue to browse our Website, and don't take steps to change your preferences, you are consenting to our use of cookies.

For instructions on how to control or delete cookies from your computer please visit www.aboutcookies.org. However, if you disable or delete certain cookies you may not be able to shop or access important parts of our website.

What type of Cookies do we use?

Our website uses session cookies and persistent cookies. Session cookies operate from the moment you enter the Website until the moment you leave. Once you log off, session cookies are deleted. Persistent cookies will not be deleted after each session.

First-Party cookies are placed by HGCC and Third-Party cookies may be used on our website by approved organisations to provide services on our website.

What Cookies are on our website?

Below is a list of all the cookies we currently use on our website:

- Necessary Cookies are essential to our Website, if these are disabled, your experience on our Website may be interrupted and you may not be able to use a shopping basket or make payment.
- Statistics Cookies to understand how visitors interact with our Website by collecting and reporting information anonymously. We use the data to improve your future experience and identify issues that our users may be experiencing.
- Marketing Cookies deliver advertisements which are tailored to your web activity. A targeting cookie tracks what you click on whilst on our Website and may share details of what you click on with other organisations such as advertisers. These cookies can also help us to measure the effectiveness of an advertising campaign.
- Unclassified Cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

We may also use the following types of cookies on our website

- Functionality Cookies customise the look and appearance of our Website. For example, a functionality cookie will remember your username and language preferences next time you visit.