

# PRIVACY AND COOKIES NOTICE

## INTRODUCTION AND GENERAL TERMS

The aim of this privacy policy is to explain to you how we control and process your data. This includes the collection, usage, disclosure, transfer, storage and disposal of your data.

KDC/ONE Swallowfield Ltd is committed to protecting your personal information when you are using our services, which we want to be a safe and enjoyable experience. This Privacy and Cookies Policy relates to our use of any personal information that we collect from you when using our website and online services. It also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

This Privacy and Cookies Policy explains the following:

- What information KDC/ONE Swallowfield Ltd may collect about you;
- How the KDC/ONE Swallowfield Ltd will use information we collect about you;
- When the KDC/ONE Swallowfield Ltd may use your details to contact you;
- Whether KDC/ONE Swallowfield Ltd will disclose your details to anyone else;
- Your choices regarding the personal information you provide to us;
- The use of cookies on KDC/ONE Swallowfield Ltd websites and how you can reject cookies.

KDC/ONE Swallowfield Ltd is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act/General Data Protection Regulation 2018 (these laws are referred to collectively in this Privacy and Cookies Policy as the "data protection laws"). No website can be completely secure.

The KDC/ONE Swallowfield Ltd website may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and are also likely to use cookies, and we therefore encourage you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

## WHO ARE WE?

Founded on principles of pioneering excellence, customer satisfaction and quality. KDC/ONE Swallowfield Ltd is a market leader in the development, manufacture and delivery of personal care and beauty products.

## WHAT INFORMATION WILL KDC/ONE SWALLOWFIELD LTD COLLECT ABOUT ME?

When using our website and interacting with KDC/ONE Swallowfield Ltd, we do collect certain personal information from you. In running and maintaining our website and in general when conducting our business, we may collect and process the following data about you:

- Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
- Information provided voluntarily by you when you register for an account online, enter a competition, promotion or survey and when you report a problem with our site. This may include name, address, payment information, telephone and email.
- Information that you provide when you communicate with us by any means.

KDC/ONE Swallowfield Ltd collects information about how you use our website and the device(s) you use to access the services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. For more information please see the section on Cookies. All such information is held on secure servers. KDC/ONE Swallowfield Ltd complies fully with all applicable Data Protection and consumer legislation, and we'll treat all your personal information as fully confidential.

## HOW WILL KDC/ONE SWALLOWFIELD LTD USE THE INFORMATION IT COLLECTS ABOUT ME?

KDC/ONE Swallowfield Ltd will use your personal information for a number of purposes including, but not limited to, the following:

- To provide our services, activities or online content, to provide you with information about them and to deal with your requests and enquiries;
- To provide you with the most user-friendly online navigation experience;
- We may also show you relevant advertising on third party sites where you have agreed to this;
- To contact you about a submission you have made;
- To use IP addresses and device identifiers to identify the location of users, to block disruptive use, to establish the number of visits from different countries, and to determine whether you are accessing our services from the UK or not.

- For analysis and research purposes so that we may improve the services offered by KDC/ONE Swallowfield Ltd. This can include using geo-demographic information from external sources, where this helps us ensure we are providing the best service possible;
- We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes;

Where KDC/ONE Swallowfield Ltd proposes using your personal information for any other uses we will ensure that we notify you first. Please see the section on Changes to KDC/ONE Swallowfield Ltd's Privacy and Cookies Policy for details.

## WHEN WILL KDC/ONE SWALLOWFIELD LTD CONTACT ME?

### General contact

We may contact you in relation to any contact or enquiry that you submit to us when using our website and online services. This also relates to any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

### Contact for marketing purposes?

KDC/ONE Swallowfield Ltd will only send you marketing emails where you have agreed to this.

We offer regular emails and bulletins to let you know about KDC/ONE Swallowfield Ltd news and services.

We may personalise the message content based upon any information you have provided to us previously and your business type.

*We may use information which we hold about you to show you relevant advertising on third party sites (e.g. Facebook, Google, Instagram, Snapchat and Twitter). If you don't want to be shown targeted advertising messages from KDC/ONE Swallowfield Ltd, some third party sites allow you to request not to see messages from specific advertisers on that site in future.*

## WILL SWALLOWFIELD SHARE MY PERSONAL INFORMATION WITH ANYONE ELSE?

Your privacy is of the highest importance to us, and we promise never to release your personal details to any outside company for their mailing or marketing purposes. We will keep your information within KDC/ONE Swallowfield Ltd except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies) or as described in this section and the section concerning Offensive or Inappropriate Content.

Generally, we will use your information within KDC/ONE Swallowfield Ltd and will only share it outside KDC/ONE Swallowfield Ltd where you have requested it or given your consent. However, we may share with third party sites (e.g. Facebook, Google, Instagram and Twitter) some data, with appropriate security measures, to show you relevant advertising on third party sites, as set out above. Sometimes KDC/ONE Swallowfield Ltd uses third parties to process your information on our behalf, for example to provide analysis. KDC/ONE Swallowfield Ltd requires these third parties to comply strictly with its instructions and KDC/ONE Swallowfield Ltd requires that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

## OFFENSIVE OR INAPPROPRIATE CONTENT SENT TO KDC/ONE SWALLOWFIELD LTD

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to KDC/ONE Swallowfield Ltd websites, social media or communications channels, KDC/ONE Swallowfield Ltd may remove such content.

Where KDC/ONE Swallowfield Ltd reasonably believes that you are or may be in breach of any applicable laws, for example on hate speech, KDC/ONE Swallowfield Ltd may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. KDC/ONE Swallowfield Ltd would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

## WHAT IF I AM AGED UNDER 18?

If you are aged 18 or under, please get your parent or guardian's permission before you submit any personal information to KDC/ONE Swallowfield Ltd when using our website and online services. This also relates to any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

## HOW LONG WILL KDC/ONE SWALLOWFIELD LTD KEEP MY INFORMATION?

We will hold your personal information on our systems for as long as is necessary for undertaking of the relevant activity, or as long as is set out in any relevant contract you hold with KDC/ONE Swallowfield Ltd.

## CAN I REQUEST THAT MY DATA BE DELETED?

Please see the section on finding out what data KDC/ONE Swallowfield Ltd holds about you.

## CAN I FIND OUT WHAT DATA KDC/ONE SWALLOWFIELD LTD HOLDS ABOUT ME?

Under the General Data Protection Regulation you have the right to request a copy of the personal information KDC/ONE Swallowfield Ltd holds about you and to have any inaccuracies corrected or your data deleted. We require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files. Please address requests and questions about this or any other question about this Privacy and Cookies Policy to the Data Manager, KDC/ONE Swallowfield Ltd, Station Road, Wellington, Somerset TA21 8NL or email [privacy@swallowfield.com](mailto:privacy@swallowfield.com).

We will need two copies of forms of identification, which can be:

Passport

Driving licence

Birth certificate

Utility bill (from last 3 months)

Current vehicle registration document

Bank statement (from last 3 months).

## COOKIES

### What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the KDC/ONE Swallowfield Ltd website. However, you can change your cookie settings at any time. Please note that cookies can't harm your computer. We don't store personally identifiable information in cookies we create, but we do use encrypted information gathered from them to help improve your experience of the site. For example, they help us to identify and resolve errors. During the course of any visit to the KDC/ONE Swallowfield Ltd website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

### How does KDC/ONE Swallowfield Ltd use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. For example, if on a previous visit you went to our Services page, we might find this out from your cookie and relevant information on your second and subsequent visits. KDC/ONE Swallowfield Ltd uses this type of information to help improve the services it provides to its users.

Please note that during your visits to KDC/ONE Swallowfield Ltd websites you may notice some cookies that are not related to KDC/ONE Swallowfield Ltd or our contractors.

To enhance the user experience, we sometimes embed content from social media and other third party websites. These may include YouTube, Twitter, Facebook, SoundCloud, Vine, Instagram, Pinterest and Flickr. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third party cookies may track your use of the KDC/ONE Swallowfield Ltd website. KDC/ONE Swallowfield Ltd does not control the dissemination of these cookies and you should check the relevant third party's website for more information. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the KDC/ONE Swallowfield Ltd website.

Where KDC/ONE Swallowfield Ltd embeds content from social media and other third party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes.

KDC/ONE Swallowfield Ltd does not control this. For more information, see the Google webpage “How Google uses data when you use our partners’ sites or apps”.

### Other information collected from web browsers

Your web browser may also provide KDC/ONE Swallowfield Ltd with information about your device, such as an IP address and details about the browser that you are using. We use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to KDC/ONE Swallowfield Ltd and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact Data manager at [privacy@swallowfield.com](mailto:privacy@swallowfield.com).

## DO NOT TRACK BROWSER SETTINGS

Do not track (DNT) is a feature offered by some browsers, with some newer browsers offering it as default. If you enable it, it sends a signal to websites to request that your browsing isn't tracked, for example by third party ad or social networks, or analytic companies. At present no industry-wide uniform standard has been agreed and adopted to determine how DNT requests should be managed, so our website doesn't currently respond to DNT requests. Until that standard is established, we'll continue to review DNT and other new technologies, but won't respond to DNT requests. We're giving you this information to comply with recent legislation, and to ensure that we are honest and clear about your privacy when using our website. We know you'd expect nothing less from us, and please be assured that we're working on a number of other privacy and cookie-related improvements to the website.

## CHANGES TO KDC/ONE SWALLOWFIELD LTD'S PRIVACY AND COOKIES NOTICE

This Privacy and Cookies Notice may be updated from time to time so you may wish to check it each time you submit personal information to KDC/ONE Swallowfield Ltd. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the KDC/ONE Swallowfield Ltd websites to submit personal information to us. If material changes are made to the Privacy and Cookies Notice, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Notice changes).

## CONTACTING KDC/ONE SWALLOWFIELD Ltd ABOUT THIS PRIVACY AND COOKIES NOTICE

If you any questions or comments about this Privacy and Cookies Notice please contact:

Data Manager  
KDC/ONE Swallowfield Ltd  
Address: Station Road, Wellington, Somerset TA21 8NL  
Email: [privacy@swallowfield.com](mailto:privacy@swallowfield.com)