

## Privacy Policy

At ProCook we value your privacy and desire to understand how your information will be handled and used by us. This Policy explains how we collect, use and store your information.

Using your information in a way that you are comfortable with and keeping your information secure is an integral part of the shopping experience we aim to provide.

ProCook will ensure that all information protection and customer legislation standards are met when handling any of your personal information. We are committed to protecting your privacy and the security of all the information that you provide us with.

On the 25th of May 2018, the GDPR – General Data Protection Regulation came into effect. These regulations were enhanced by the UK Data Protection Act 2018, which became UK law at the same time. Since Brexit, the EU has ruled that the protection offered by these UK laws gives equivalent protection to the EU GDPR. These regulations are now known as UK GDPR.

To make it easier for you to find out what data we collect and how we use it, our Privacy Policy includes:

1. The types of personal information we collect, why we need it and how we use it
2. The legal basis we rely on to use your information
3. Your rights relating to the information that we hold about you
4. How we keep your information safe
5. Contact details for ProCook's Data Protection Officer and of the UK Information Commissioner's Office (ICO)

### Who is collecting the data?

ProCook Limited is the data controller for information that we collect through all of our channels including our website, social media, over the phone and through e-mails. ProCook Limited is the Data Controller, registered with the ICO under registration number ZA091245. References in this Privacy Policy to "we", "us" and "ProCook" are to ProCook Limited (Company registration number: 06639057. V.A.T No: 414068518), the registered company address is: ProCook, 10 St Modwen Park, Gloucester, United Kingdom, GL10 3EZ.

### Legal basis for data processing

Under the definitions outlined in UK GDPR we process information under one or more the following lawful bases:

#### 1. Contractual

We must process your personal information to comply with our contractual obligations. When you place an order with us, this creates a contract between us. To fulfil your order and complete the contract we must process some of your personal details like your name and address. Without these details we are unable to fulfil your order.

#### 2. Legal Obligation

Under some circumstances we may need to process your data for legal reasons. For example if there is a product recall or if we need to check that you are allowed to buy age restricted products.

#### 3. Legitimate Interests

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or

interests. This includes analysing your customer data to understand trends, sending you relevant marketing emails if you are a previous customer who consented to marketing and showing you adverts on social media.

#### 4. Consent

We may ask you for permission to process your personal data for specific reasons. We will only use your consent for the specific purposes stated, and you may withdraw it at any time. We may wish to send you a happy birthday message or offer. We will only hold your birthday on file if you give us your express consent.

#### What personal data do we collect?

We collect the following personal information:

- Your name and (if relevant) company name
- Contact information including phone number and e-mail address
- Billing and delivery addresses
- Payment card details
- Where required proof of identity for age verification. This maybe direct or from agencies
- Your feedback via phone, email, post or social media
- Account login details for our services, including your username and chosen password
- Your marketing preferences
- Information about when and how you use our websites. This includes the device information such make, model, browser and IP address
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Imagery or video content

#### How do we collect the personal data?

- Through our checkout process at our retail outlets, when you place orders on our website or over the telephone if you place your order in this manner.
- When you create an account with us.
- When you communicate to us through our online contact forms, email or instant messaging
- When you enter prize draws, competitions or complete a survey.
- When you review our products and services
- When you interact with us through our social media sites.
- When CCTV is operational in any of our operational locations and premises

#### What do we do with the information we collect?

##### *Placing an order*

The information you provide us with is required to process your order, including taking the payment and delivering the goods. We may also need to contact you if we need to discuss any aspect of your order, for example stock delays, discontinued products, recalls or if we believe you have ordered incorrect items.

We need to carry out age verification if you purchase any knives or bladed items.

When you participate in a competition, prize draw, giveaway or offer, or sign up to attend one of our events, either through ProCook or indirectly through a third party, the information obtained will be used to administer competitions and manage events, including securing your registration at an event, and selecting and contacting prize winners.

If you provide the personal information of another customer for one of our events, we will assume you have the consent of any named individuals to provide their personal information for these purposes.

## *Marketing*

We like to tell you about our great offers, ideas, and products that we think will be of interest. Where we have your consent or it is in our legitimate interests to do so, we may do this through the post, by email, text message or by any other electronic means.

However, we won't send you marketing messages if you tell us not to.

When you order you can tick a box to remove yourself from our email marketing and all our subsequent marketing emails give you the option to opt out.

We use automated decision making, including profiling, in certain circumstances, such as when it is in our legitimate interests to do so, or where we have a right to do so because it is necessary for us to enter into, and perform, a contract with you. We use profiling to enable us to give you the best service possible including specific marketing which we believe you will be interested in.

For example we use your shopping and browsing history to make suggestions to you on other products which we believe you will be interested in. We also use information about how you browse our website to make improvements to the experience for all customers.

## *Competitions and events*

When you participate in a competition, prize draw, giveaway or offer, or sign up to attend one of our events, either through ProCook or indirectly through a third party, the information obtained will be used to administer competitions and manage events, including securing your registration at an event, and selecting and contacting prize winners.

If you provide the personal information of another customer for one of our events, we will assume you have the consent of any named individuals to provide their personal information for these purposes.

Your information will be deleted shortly after the promotion or event has finished unless you have signed up to receive marketing communications from us.

## *CCTV video and imagery*

CCTV imagery and video content are recorded to help ensure the safety of our staff, customers, and property. All footage is stored locally on a secure Digital Video Recorder (DVR) hard drive. Access to the DVR is restricted to authorised personnel only, specifically store management, and is protected by an admin-level account.

Recordings are only viewed in the event of an incident such as suspected criminal activity or a health and safety concern and may be shared with police if required. All CCTV data is retained for a maximum of 30 days. After this period, the footage is automatically and permanently deleted in line with our retention policy.

Clear signage is in place to inform individuals that CCTV is in operation. Under UK GDPR, individuals have rights regarding their personal data, including the right to access footage they appear in.

## **Your rights**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects for you or affects you in any other significant way.

If you wish to amend your preferences, please contact us using the details in the "Contact Us" section below.

## Who do we share personal data with?

We sometimes share your personal data with trusted third parties. ProCook will only provide the information needed by the third party to perform their service under a specific contract.

We work closely with them to ensure that your privacy is respected and protected at all times.

If we stop using their services, any of your data held by them will be deleted or transferred back to us

Example third parties include:

- Payment gateways to securely take payments.
- Operational services such as couriers to deliver your order.
- Direct marketing companies who help us deliver our electronic communications.
- Review platform to collect reviews from customers who have placed orders with us
- Analytical and profiling services to personalise your shopping experience to provide relevant marketing, personalised offers and shopping ideas

### *Third parties that are located outside of the UK*

For any third-party company outside of the UK, who we share data with, we will use a model contract with Standard Contractual Clauses (SCCs) in a form approved by regulators. In addition, we will put into place additional technical measures in order to protect the confidentiality of your data.

## How long do we keep your data?

The policy of ProCook is to only keep information for as long as required for the purpose or purposes for which we use it. For example, we will store details of your invoices in order to process return requests, warranty claims or queries relating to any orders that you have placed with us in the past. We will determine how long to retain different data based on how long we need the information for and what it is used for, as well as any legal or regulatory requirements that require us to retain records and details of purchases for an additional period of time. For orders, the retention period is 7 years after the sale (if your order included a warranty, we will keep the associated personal data until the end of that period).

CCTV imagery and video content are retained for 30 days, after which all data is permanently deleted in accordance with our retention policy.

## Data Protection Rights

Under UK GDPR individuals are entitled to the rights to be informed, to access, to rectification, to erasure, to restrict processing, to data portability and to object.

## How can you control your personal information?

You can exercise these rights by contacting us using the details in the “Contact us” section below.

Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests. We will process each request according to UK GDPR guidelines.

If you wish to amend your marketing preferences, you can do so by logging into your ProCook account, viewing “Your Account Details” and clicking the “Change Marketing Preferences” button or if you don’t have an account by visiting our Marketing Preferences page.

Please note that it can take up a little while for all marketing to stop once you either withdraw your consent or tell us you'd like to opt out of marketing. This is because some marketing may already be in transit. If you believe that the information, we have for you is incorrect, please write to or e-mail us as soon as possible to enable us to rectify incorrect data.

You may request details of the personal information that we hold about you under the terms outlined in the UK GDPR.

## **Cookies**

Cookies are small text files of letters and numbers that your browser can store on your device. These files are created when you visit a site or service that uses cookies. Our website uses cookies to offer improved site functionality, distinguish you from other users and provide information about how our website is used.

For more information about how you can manage cookies within your browser, you can visit [www.aboutcookies.org](http://www.aboutcookies.org). Visit the Cookie Policy page to view our cookies and change your preferences.

## **Security**

ProCook shall ensure that the personal data collected and processed is kept secure and protected against any unlawful processing and against accidental loss, destruction and modification.

## **Changes to our Privacy Policy**

If you have any questions, comments or requests regarding this Privacy Policy, please send your email to:

[dataprotection@procook.co.uk](mailto:dataprotection@procook.co.uk). Or write to us: DPO, ProCook, 10 Indurent Park, Gloucester, United Kingdom, GL10 3EZ.

## **Contacting the regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to complain to the Information Commissioner's Office.

You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (please note we can't be responsible for the content of external websites).

## **Approved by the Board of Directors**

24 June 2025