



TREDERWEN SPRINGS

Trederwen Springs 2008 Ltd
T/A Trederwen Springs
Llansantffraid-Ym-Mechain
Powys, SY22 6SY
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Company Reg No: 06452544

Privacy Policy

Trederwen Springs 2008 Ltd is a bottling company, incorporated under the laws of England and Wales under company registration number 06452544, and its registered office is at The Factory, Llansantffraid-ym-Mechain, Powys, Wales, SY22 6SY.

Trederwen Springs 2008 Ltd data protection and privacy measures are governed by:

- i. the General Data Protection Regulation ((EU) 2016/679) (hereafter referred to as "GDPR") and any national implementing laws, regulations and secondary legislation, in the UK and
- ii. any successor legislation to the GDPR or the Data Protection Act 1998 (hereafter referred to as "Data Protection Legislation").

1. Introduction

This privacy policy sets out how Trederwen Springs 2008 Ltd uses and protects any information that you provide to Trederwen Springs 2008 Ltd (including information provided through the website www.trederwensprings.co.uk).

Trederwen Springs (2008) Ltd was founded back in 2008 when our production site in the foothills of mid-Wales was built adjacent to Trederwen Hall in Llansantffraid-Ym-Mechain, Powys. We draw natural spring water from the surrounding hills local to the factory.

2. Personal data and basis for collection

For the purpose of Data Protection Legislation, where personal data is provided directly to Trederwen Springs (2008) Ltd through the use of the website, email, or other means Trederwen Springs 2008 Ltd will be a data controller (as defined in the Data Protection Legislation) of such information. Where Trederwen Springs (2008) Ltd is provided with information only for the purpose of performing a contract or where Trederwen Springs (2008) Ltd cannot determine the use of such information, Trederwen Springs (2008) Ltd will be data processor (as defined in the Data Protection Legislation) of such information.

Trederwen Springs (2008) Ltd may collect, use, store and transfer different kinds of personal data about you which Trederwen Springs (2008) Ltd have grouped together as follows:

- Identity Data including names, username or similar identifier, title, job title, directorships.
- Contact Data including billing address, delivery address, and email address and telephone numbers.
- Financial Data including bank account and payment card details.
- Transaction Data including details about payments to and from you and other details of products and services you have purchased from Trederwen Springs 2008 Ltd.
- Usage Data including information about how you use Trederwen Springs (2008) Ltd products or submit an enquiry or query through the Websites.
- Marketing and Communications including your preferences in receiving marketing or surveys from us and our third parties and your communication preferences.
- Additional Information including additional information you chose to provide to us.

Unless you provide such information to us to customise the service we may provide to you, Trederwen Springs (2008) Ltd does not process 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 does Trederwen Springs 2008 Ltd collect any information about criminal convictions and offences.

3. How is your personal data collected?

Trederwen Springs (2008) Ltd use different methods to collect personal data from and about you including through:

- Direct interactions. You may give us your Identity and Contact by filling in a form or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
 - give us some feedback, a complaint, general enquiry, enter a competition, or complete a survey;
 - request marketing to be sent to you; or
 - create an account on our websites.
- Third parties. We may receive personal data about you from various third parties, including our customers.

4. Purposes for which Trederwen Springs (2008) Ltd will use your personal data

Set out below is a description of all the ways we plan to use your personal data, and the legal basis on which we rely 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 water@trederwensprings.co.uk if you need details about the specific legal basis on which we are relying to process your personal data.

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	Performance of a contract
To process and deliver the products including: (a) Managing payments and charges (b) Collecting and recovering money owed to us (c) Contacting you and corresponding about our products (d) to provide support to the services	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)
To respond to queries and enquiries	(a) Identity (b) Contact	Legitimate interests (to offer similar services or offers)
To undertake any marketing to you	(a) Identity (b) Contact	Legitimate interests (to offer similar services or offers)
Business Performance – To manage our business performance, assess client satisfaction, and improve our Services	(a) Identity Data (b) Individual Data	Legitimate interests (to improve the services we provide)
Events – To enable us to provide events to you which take into consideration your preferences	(a) Identity Data (b) Individual Data (c) Event Data	Legitimate interests (to tailor events) Consent

5. Change of purpose

Trederwen Springs 2008 Ltd will only use your personal data for the purposes for which it was collected - 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 water@trederwensprings.co.uk.

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.

6. How your personal data may be shared

Personal data that Trederwen Springs 2008 collects in accordance with this Privacy Policy, may be shared as follows:

- where Trederwen Springs 2008 is under a duty to disclose your personal data to comply with any legal obligation or to enforce or apply GS1 UK's terms and conditions and other agreements;
- with third parties to whom we may choose to 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.

7. How Trederwen Springs (2008) Ltd stores personal data

For secure storage, Trederwen Springs (2008) Ltd ensures that it stores your personal data within the UK.

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.

8. Personal 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 marketing or sales requirements. Generally, we keep personal data in accordance with our internal retention procedures, which are determined in accordance with our regulatory obligations and good practice. These retention periods depend on the nature of the information and are subject to change. If you have any questions in this regard, please contact us using the details below.

9. Your rights

Under certain circumstances, you have rights under Data Protection Legislation in relation to your personal data. These include the right to:

- request access to your personal data;
- request correction of your personal data;
- request the erasure of your personal data;
- object to the processing of your personal data;
- request the restriction of processing your personal data;
- request transfer of your personal data; and
- right to withdraw consent.

To exercise any of the above rights please email your request to: water@trederwensprings.co.uk

Where you exercise your right to erasure or where information is deleted in accordance with Trederwen Springs (2008) Ltd retention policy, please note that after the deletion of your personal data, it cannot be recovered, so if you require a copy of this personal data, please request this during the period Trederwen Springs (2008) Ltd retains the data.

10. Children

The website is not intended for children. Trederwen Springs (2008) Ltd will not knowingly collect any personal data from persons under the age of 18 and will immediately delete any such data subsequently so determined.

11. Complaints

If you would like to make a complaint in relation to how Trederwen Springs (2008) Ltd may have stored, used or processed your personal data, 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). However, Trederwen Springs (2008) Ltd would appreciate the chance to deal with your concerns before you approach the ICO, so, please contact us in the first instance.

12. Changes to this privacy policy and your duty to inform us of changes

As and when necessary, changes to this privacy policy will be posted here. Where changes are significant, we may also email all our registered users with the new details, and where required by law, will we obtain your consent to these changes.

This Privacy Policy was last updated on 1st August 2024.

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.

13. Questions and contact information

For any questions or further information, please contact: water@trederwensprings.co.uk