



Privacy Policy

This Privacy Policy sets out how we, Children of the Revolution Drinks Company Ltd, obtain, store and use your information when you use or interact with our website, www.cut-classics.com (our **website**), or where we otherwise obtain or collect your information. The effective date of this Privacy Policy is 1 November 2021.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** Children of the Revolution Drinks Company Ltd
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us, placing an order on our website and by signing up to our newsletter),
 - from your use of our website, using cookies and similar technologies, and
 - occasionally from third parties.
- **Information we collect:** name, contact details, IP address, name, contact details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you





accessed our website (based on your IP address), company name or business name (if applicable), and VAT number.

- **How we use your information:** for administrative and business purposes (particularly to contact you and process orders you place on our website), to improve our business and website, to advertise our goods and services, to analyse your use of our website and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, and where required by law or to enforce our legal rights.
- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and certain additional factors described in the main section below entitled How long we retain your information. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, and only granting access to your information where necessary.
- **Use of cookies and similar technologies:** we use cookies and similar information-gathering technologies on our website including essential, functional, analytical and targeting cookies. For more information, please visit our cookies policy here: www.cut-classic.com/cookies
- **Transfers of your information outside the European Economic Area:** we will only transfer your information outside the European Economic Area if we are required to do so by law. Where we do so, we will ensure appropriate safeguards are in place, including for example ensuring that the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with the EU-U.S. Privacy Shield.
- **Use of automated decision making and profiling:** we do not use automated decision making or profiling.
- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority





- **Sensitive information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive information'. Please do not submit sensitive information about you to us. For more information, please see the main section below entitled [Sensitive Information](#).

Our details

The data controller in respect of our website is Children of the Revolution Drinks Company Ltd, company registration number 12698830, registered address 20-22 Wenlock Road, London N1 7GU. The data controller is the person which determines the purposes and means of processing your information. You can contact the data controller by writing to PO Box 144, Monmouth NP25 9BZ or sending an email to hello@cut-classics.com.

If you have any questions about this Privacy Policy, please contact the data controller.

[BUTTON: VIEW FULL POLICY HERE](#) (Launch PDF in new tab with full Privacy Policy Attached).

How we collect or obtain information about you

Information collected from you

We collect information about you when you provide it to us, such as through your use of our website and its features, when you contact us directly by email, phone, in writing, or via social media, when you order goods and services, when you use any of our other websites or applications or any other means by which you provide information to us. The type of information we collect about you may include information such as:

- your name;
- your email address;
- your address;
- your phone number;
- your IP address;
- information about your device (e.g. device and browser type);
- information about how you use our website (e.g. which pages you have viewed, the time you viewed them and what you clicked on);
- cookies and similar technologies;
- information about your mobile device (such as your geographical location).

Our use of cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users of a website.

We use cookies and similar technologies on or via our website. For further information on how we use cookies and similar technologies, including the information we collect through our use of cookies and



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PROTECTED BY COPYRIGHT INFRINGEMENT DETECTION SOFTWARE.





similar technologies, please see our cookies policy, which is available via the following link: www.cut-classics.com/cookies

You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so may impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org

We use Google Analytics on our website to understand how you engage and interact with it. For information on how Google Analytics collects and processes data using cookies, please visit www.google.com/policies/privacy/partners/. You can opt out of Google Analytics tracking by visiting: <http://tools.google.com/dlpage/gaoptout>

We use Facebook Pixel on our website to monitor and measure the success of our advertisements. For information on how Facebook collects and processes data using Facebook Pixel, please visit <https://www.facebook.com/about/privacy>. You can block Facebook Pixel by visiting <http://www.youronlinechoices.com>, selecting your country, clicking “Your Ad Choices”, then locating Facebook and selecting the “Off” option.

[Information received about you from third parties]

Generally, we do not receive information about you from third parties.

It is possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal bases for processing

Where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances. For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract. Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.





Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one).

Legal bases for processing

Where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard. For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

In certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement. We may also obtain data brokers to market to you under our legitimate interest of direct marketing.

How we use your information

We will use your information for one or more of the following purposes. The legal basis on which we use your information is set out and explained after each purpose:

Administrative and business purposes

- **Improving our website and business, including personalising our website and services for you and other customers.** This is necessary for our legitimate interest of better understanding our other customers' and potential customers' preferences and tailoring our website, products and services to their needs, preferences and desires.
- **Communicating directly with you with information, updates and changes to our website and in response to enquiries we receive from you.** This is necessary for our legitimate interests of informing you about changes to our business, website and privacy policy and responding to enquiries we receive from you.
- **Protecting our business and our business interests, including for the purposes of credit and background checks, fraud and website misuse prevention and debt recovery.** This is necessary for our legitimate interests of preventing criminal activity such as fraud or money laundering, for ensuring that our website and services are not misused. Where we carry out credit and background checks, we will only carry out such checks to the extent that we are permitted or authorised by law to do so and to the minimum extent necessary.





- **Communicating with our business advisors and legal representatives.** This is necessary for our legitimate interests of obtaining legal or professional business advice. In such circumstances, we will only share your information where it is necessary to do so, to the minimum extent necessary, subject to appropriate confidentiality restrictions and on an anonymised basis wherever possible.
- **Sharing your information with third parties which are either related to or associated with the running of our business (including to third parties within our corporate group from time to time) such as our business partners, insurers, and fulfilment / logistics / delivery service providers.** We will share your information with these there parties where it is necessary for our legitimate interest of running and managing our business effectively, fulfilling our contractual obligations (e.g. to our insurers) or for our own direct marketing purposes. Where you purchase goods or services from us or request that we take steps to do so, we may also need to share your information with such third parties in order to perform a contract which we have entered into with you or to take steps, at your request, to enter into a contract with you. Where we share your information with such third parties, we will do so strictly on a need-to-know basis, subject to appropriate confidentiality restrictions, on an anonymised basis as far as possible and only to the extent strictly necessary for any of these purposes.
- **Processing or passing on your information to third parties, such as payment service providers, including PayPal and Shopify Payments, in order to process your payments for goods and services you order from us.** This is necessary for us to perform a contract we have entered into with you (or to take steps, at your request, to enter into a contract with you) and for that third party's legitimate interest in processing your payment(s) for goods and services you order from us. You can access the privacy policy of PayPal here: <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full> and for Shopify Payments here: <https://www.shopify.co.uk/legal/privacy/customers>
- **Ensuring physical, network and information security and integrity.** This is necessary for our legitimate interest of ensuring that our IT systems and networks are secure and uncompromised, including, for example, preventing malware, viruses, bugs or other harmful code, preventing unauthorised access to our systems, and any form of attack on, or damage to, our IT systems and networks.
- **In connection with disclosure requests and in the case of a business or share sale or sale or purchase of a business and/or assets, whether actual or potential.** This is necessary for our legitimate interests of selling and/or ensuring and promoting the success of our business. Where we share your information with a prospective purchaser or seller, we will do so on a strictly need-to-know basis, subject to appropriate confidentiality restrictions, on an anonymised basis as far as possible and only to the extent strictly necessary for any of these purposes.
- **To send you marketing communications.** This is necessary for our legitimate interest of direct marketing and promoting our business. Where we are required by law to obtain your consent to market to you, however, the legal basis on which we process your information will be your consent rather than our legitimate interests.

Advertising and analytical purposes





- **Providing statistical information to third parties such as Google Analytics and Facebook.** This is necessary for our and third parties' legitimate interests of processing information for research purposes, including market research, better understanding our respective customers, and tailoring our respective products and services to their needs. Your information will only be shared with such parties on an anonymised basis.
- **Displaying advertisements to you and analysing the information we receive in relation to those advertisements.** This is necessary for our own and for third parties' legitimate interests in direct marketing and advertising our and their products and services respectively, and for market research purposes.

Legal and enforcement of legal rights

- **Enforcing our legal rights.** This is necessary for our legitimate interest of protecting our business and enforcing our contractual and other legal rights.
- **Indicating possible criminal acts or threats to public security to a competent authority.** This is necessary for our legitimate interest of promoting the success of our business, preventing crime, for compliance with a legal obligation to which we are subject, in the general public interest or for the legitimate interests of governmental bodies and competent authorities that prevent crime.
- **In connection with any legal or potential legal dispute or proceedings.** This is necessary for our legitimate interest of promoting and ensuring the success of our business, resolving disputes and making such disclosures as are required by law or which we consider, acting reasonably, are required by law.
- **Complying with laws, regulations and other legal requirements.** We may need to use and process your information in order to comply with legal obligations to which we are subject. For example, we may require your information pursuant to a statutory obligation to conduct anti-money-laundering checks or to disclose your information to a court following receipt of a court order or subpoena. We may also need your information to comply with ongoing legal obligations, such as tax laws and regulations to which we are subject (where you have placed an order for goods or services with us for example).

The processing of your information to comply with legal obligations to which we are subject applies to legal obligations of other countries where they have been integrated into the legal framework of the United Kingdom, for example in the form of an international agreement which the United Kingdom has signed. Where the legal obligations of another country have not been so integrated, we will process your information to comply with such obligations where it is in our legitimate interest to do so.

Use of your information only where we have your consent

Where we process your information on the basis of your consent, you can withdraw your consent to such processing at any time by emailing us at hello@cut-classics.com or writing to us at PO Box 144, Monmouth NP25 9BZ.





How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for *[insert period for which you retain information from server logs]*.

Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for one further month after which point we will delete your information.

E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- [the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and

any relevant surrounding circumstances (such as the nature and status of our relationship with you).





How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt [any information you submit to us via any forms on our website] [and] [any payment transactions you make on or via our website].

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information to other countries and safeguards used

We may need to transfer your information outside of the country in which we collected or obtained it, including outside the European Economic Area or to an international organisation from time to time. Where we transfer your information outside the European Economic Area, the country to which it is transferred will either be subject to an adequacy decision by the European Commission, or if not (or if we transfer your information to an international organisation), we will ensure that the transfer takes place on the basis of one or more of the following safeguards:

- data protection policies adhered to by the data controller and other companies and entities within our corporate group from time to time, which comply with applicable laws, known as “binding corporate rules” or “BCRs”;
- standard data protection clauses adopted by the European Commission or adopted by the Information Commissioner’s Office and approved by the European Commission in accordance with relevant law;
- a code or codes of conduct produced by an association or other body approved by the Information Commissioner’s Office;
- an approved certification mechanism (such as the EU-US Privacy Shield); or





- where authorised by the Information Commissioner's Office, contractual clauses between the data controller or processor and the data controller, processor or recipient of the information in the third country or international organisation.

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Children of the Revolution Drinks Company Ltd, PO Box 144, Monmouth NP25 9BX:

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled [Your right to object to the processing of your information for certain purposes](#)); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
- **the right to lodge a complaint with a supervisory authority**, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is *Information Commissioner's Office (ICO)*, the contact details of which are available here <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf





Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to Children of the Revolution Drinks Company Ltd, PO Box 144, Monmouth NP25 9BX:

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link.

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled [How to accept or reject cookies](#) in our cookies policy, which is available here: www.cut-classics.com/cookies

Consequences of not providing your information to us

Where you wish to purchase products or services from us, we require your information in order to enter into a contract with you. We may also require your information pursuant to a statutory obligation (in





order to be able to send you an invoice for products and services you wish to order from us, for example).

If you do not provide your information, we will not be able to enter into a contract with you or to provide you with those products or services.

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.





Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to cc@cut-classics.com .

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal. For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: www.cut-classics.com/cookies

Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.

