



Website Privacy Notice

Last Updated: 1st November 2023

1. Introduction

The Greater Good Fresh Brewing Co Ltd t/a Pinter, of Unit 11a, Uplands Business Park, Blackhorse Lane, London, E17 5QN, UK and Pinter USA Group Inc., of 8 The Green, Suite R, Dover, Kent County, Delaware 19901, USA (“Pinter”, “us”, “we”, “our”) are fully committed to the protection of the Personal Data we process in line with the data protection principles set out in the relevant data protection laws. These Data Protection Laws include the UK General Data Protection Regulation (“UK GDPR”); the Data Protection Act 2018 (“DPA 2018”); the Privacy and Electronic Communications Regulations 2003 (PECR) as amended; the California Consumer Privacy Act (CCPA); the California Privacy Rights Act (CPRA); the Colorado Privacy Act (CPA); the Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA); the Delaware Personal Data Privacy Act (DPDPA); the Florida Digital Bill of Rights (FDBR); the Indiana Consumer Data Protection Act (ICDPA); the Iowa Consumer Data Protection Act (ICDPA); the Montana Consumer Data Privacy Act (MCDPA); s1 – s9 Oregon Consumer Privacy Act (OCPA); the Tennessee Information Protection Act (TIPA); the Texas Data Privacy and Security Act (TDPSA); the Utah Consumer Privacy Act (UCPA); and the Virginia Consumer Data Protection Act (CDPA) collectively referred to herein as the “Data Protection Law”.

If you are in California, United States, please refer to your California Consumer Privacy Act (“CCPA”) rights in Appendix A.

The purpose of this privacy notice is to explain what Personal Data we collect about you when you visit our website or register to use our services. When we do this, we are the Controller of the Personal Data we process, registered in the UK with the Information Commissioner’s Office (“ICO”), registration number ZA237189.

At Pinter, we mean what we say and we say what we mean. So, when we tell you we are serious about ensuring the quality, confidentiality, integrity and availability of the data we hold, and meeting our data protection obligations when processing Personal Data, it means our company is genuinely committed to protecting the security of your Personal Data. We use a variety of technical and organisational measures to help protect your Personal Data from unauthorised access, use, or disclosure.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice, you can contact us using the information provided below (in the **Contact us** section).

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

2. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You are a registered customer



3. You complete a new registration
4. You make an enquiry about our services
5. You complete an online form
6. You sign up to receive newsletters and/or other promotional communications from us

3. What Personal Data is

“Personal Data” means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation. Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

4. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. We process all information you give us, either through our website, www.pinter.co.uk (“our site”), or interacting with us by telephone, email or otherwise. This includes information you provide when you use or report a problem with our site, register for our service, make a purchase from us over the phone, search for a product or service, or other social media functions linked to our site.

We may process the following information following an enquiry:

- Name
- Date of Birth
- Email address
- Account password
- Any information you share through our social media channels
- Device information
- Location data

We use your name, email address and telephone number to contact you about your enquiry.

The list of information processed when setting up an account may include, but is not limited to:

- Name
- Address
- Email address
- Telephone number(s)
- Date of Birth
- Account password
- Payment card details
- Device information
- Location data

Payment card details are processed by Pinter for telephone transactions only. Online financial transactions are handled independently by our payment provider Stripe. Click [here](#) to view the Stripe Global Privacy Notice.



Cookies and Web Beacons

We use cookies on our website and web beacons in some emails. Cookies are small text files and web beacons are small graphic images. They're downloaded to your device when you visit a website or receive certain emails, unless you've set your browser to reject them.

How We Respond To Do Not Track Signals

We do not respect browser Do Not Track settings for our analytics cookies, as we use analytics information to understand web traffic. This data is not shared with third parties.

5. Purposes for which we use Personal Data and the legal bases

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Purpose	Lawful Bases for Processing
Responding to correspondence from you	It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means.
Setting up a customer account to facilitate purchases	When you set up an account with us, we process your data to satisfy the sales contract between us
Business management, forecasting and statistical purposes	It is our legitimate interest to identify areas for managing current business relationships, develop our services and for managing our business
Improving our website and the overall visitor and user website experience	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our website
Improving our website and the overall visitor and user website experience	We use cookies on our website with your consent. Cookies can be managed using your browser settings
Prevention and detection of crime, including money laundering, fraud, or other crimes	We have a legal obligation to report any such activity to the relevant authorities and regulators
Providing you with a newsletter containing offers, promotions and useful hints and tips	We rely on your consent to send you our newsletter. This consent may be withdrawn at any time by emailing privacy@pinter.co.uk or by contacting us by telephone or via our social media platforms



Analyse and track users of our website for reporting and analytical purposes	It is our legitimate interest to monitor our website usage in order to continually improve the user experience
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6. Sharing your data

It is unlikely that we will ever share your Personal Data outside the UK. If a business need arises and it becomes necessary for us to share your data outside the UK for the purposes of providing our services to you, we will only share it with organisations in countries which benefit from a UK Adequacy Regulation, or if not, by using the UK International Data Transfer Agreement, which contractually obliges the recipient to process and protect your Personal Data to the standard expected within the UK.

We may share your name, address, email address and transaction history with approved data agencies – they help us segment and model our data. It sounds very complicated, but these organisations help us to analyse our customer base and to identify potential new customers, and to target our marketing in a way that is most relevant for you. In all instances, we provide them with only the information they need to perform their function.

Our website includes links to other third-party websites and social media platforms (Facebook, Instagram, X (formerly known as Twitter)); when you navigate away from our site via one of the links, the site may collect your IP address and may set a cookie on your device. When you use one of these links, you’re sharing information with another website or service and this Notice will no longer apply. Please read the privacy notices provided by the particular service website you are directed to before posting any personal information using these links.

7. How long we keep your data

We will retain your Personal Data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your Personal Data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

8. How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- Never share One Time Passcodes (OTPs);
- Never enter your details after clicking on a link in an email or text message;
- Always send confidential information by encrypted email to reduce risk of interception;
- If you are logged into any online service, do not leave your computer unattended;
- Close down your internet browser once you have logged off;



- Never download software or let anyone log on to your computer or devices remotely, during or after a cold call; and
- You can easily identify secure websites by looking at the address in the top of your browser which will begin <https://> rather than <http://>.

9. Your data protection rights

There are certain, fundamental, rights that you have in respect of your Personal Data:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data.
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information.
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
Right to erasure (the 'right to be forgotten')	Individuals have the right to request their personal information to be erased, in certain circumstances.
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: <ul style="list-style-type: none"> • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, but you want us to keep it for use in legal claims; or • if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances.
Right to object	Individuals have the right to object to the processing of their Personal Data, in certain circumstances. Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way. Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so.



Rights	Description
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent (if applicable)	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time.
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with the relevant supervisory authority.

10. Exercising your data protection rights

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances

11. Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the following email address privacy@pinter.co.uk.

12. How to complain

Let us know if you have a complaint about the way we process your Personal Data by contacting our Data Protection Manager using the email address provided.

In addition to the above, you have the right to make a complaint at any time to the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data.

In the UK, you can contact the Information Commissioner's Office by dialling 0303 123 1113 or by visiting <https://ico.org.uk/make-a-complaint/>.

APPENDIX A

California Consumer Privacy Act ("CCPA")

California Privacy Rights Act (CPRA)



This Appendix A (“Appendix”) applies to California residents and outlines your rights regarding the processing of the Personal Data we hold about you under the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”).

1. Introduction

Pinter USA Group Inc. (“Pinter”) are responsible for determining the purposes and means of processing your data when:

- You visit our website or make general enquiries with us;
- We communicate with you regarding our services;
- We contact you for sales and marketing purposes; and
- During our standard business practices.

2. Personal Data we collect, the purposes and legal basis

Please refer to the ‘**Personal Data we collect**’ and the ‘**Purposes for which we use Personal Data and the legal basis**’ sections in our main Privacy Notice to learn more about the Personal Data we collect and use.

In summary, we collect the following categories of Personal Data as classified under the CCPA:

- Online identifiers, such as your email address and IP address;
- Personal information categories (Cal. Civ. Code § 1798.80(e)), such as your first name, last name, address and phone number(s); and
- Internet or other similar network activity information, such as information regarding your interaction with our website.

Personal Data does not include publicly available information. ‘Publicly available’ means information that is lawfully made available from federal, state, or local government records. ‘Publicly available’ does not mean biometric information collected by a business about a consumer without the consumer’s knowledge.

3. Sharing your Personal Data

Pinter shares your personal information with service providers such as technology service providers and other business partners as part of our business practices and to provide you with our Services.

Please see the ‘**Sharing your data**’ section in our Privacy Notice for additional details on how we disclose your personal information with selected recipients for specific purposes.

Pinter does not sell your Personal Data to advertisers or other third parties.

In summary, Pinter share the following categories of information as classified under the CCPA:

- Online identifiers, such as your email address and IP address;
- Personal information categories (Cal. Civ. Code § 1798.80(e)), such as your first name, last name, home address and phone number(s); and



- Internet or other similar network activity information, such as information regarding your interaction with our website.

3. Your rights

In addition to the rights mentioned in our main Privacy Notice, the CCPA provides California consumers with the following additional rights:

- **Right to Opt-out of the Sale of Personal Data** – You have the right to opt-out of the sale of the Personal Data we have collected about you. Although this right is available to you, **Pinter does not sell your Personal Data to third parties.**
- **Right to Non-Discrimination** – You have the right to not receive discriminatory treatment for exercising any of your CCPA rights. Pinter will not treat you differently for exercising any of the rights described in this Appendix or the main Privacy Notice.

You can exercise any of your rights by emailing privacy@pinter.co.uk. You may also authorise an individual to submit a verifiable consumer request relating to your personal information.

To help protect your privacy and maintain security, we take steps to verify your identity before responding to requests. To verify your identity and confirm the Personal Data relates to you, we may ask you to confirm your identity.

If you wish to use an authorised agent to submit a request on your behalf, you must provide the authorised agent written permission signed by you, the customer. We may deny a request from an authorised agent if the agent cannot provide your signed permission demonstrating that they have been authorised to act on your behalf.

Generally, we will respond to your rights request within one month of receipt, however the CCPA allows us to respond within 45 days. Your request and choices may be limited in certain cases, for example, if fulfilling your request is not permitted by law or if we have compelling legitimate interests to refuse your request.

4. Contact us

If you have any questions about this Appendix, this Privacy Notice, your rights, or data protection in general, please contact us at privacy@pinter.co.uk.