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## COOKIES AND PRIVACY POLICY

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### What is a cookie?

A cookie is a small text file created by your browser and stored on the hard drive of your computer (if you opt in).

The purpose of cookies on our website is to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

### What information do we capture?

1. Cookies: \_\_utma, \_\_utmz, \_ga via Google Analytics

These cookies are generated by Google Analytics for the purposes of analysing our website visitor statistics (e.g. how many visitors we have received, and which pages were most popular). The cookies are used purely for the assessment of the site's performance and do not contain any personalised information. They can be deleted at any point without impacting your experience of the site.

### What personal data do we capture?

All cookies' data collected on our site are anonymised. We do not collect personal data and do not know your name, address, phone number or email address unless you provide us with your contact details requesting us to contact you.

We do not share and do not intend to share your information with any third party.

### What do you need to know regarding the data we capture about you?

<b>Data Controller</b>	Ball & Young Limited, trading as 'Ball & Young' and 'The Vita Group' Oldham Road, Middleton, Manchester, M24 2DB, United Kingdom <a href="mailto:dataprotection@thevitagroup.com">dataprotection@thevitagroup.com</a>
<b>Data Protection Officer (DPO) for any queries or complaints, please write to:</b>	Bridget Groarke Data Protection Officer Vita Group, Oldham Road, Middleton, Manchester, M24 2DB, United Kingdom <a href="mailto:dataprotection@thevitagroup.com">dataprotection@thevitagroup.com</a> +44 161 643 1133
<b>Lead Supervisory Authority</b>	Dutch Data Protection Authority / Autoriteit Persoonsgegevens  Postal address: Autoriteit Persoonsgegevens, PO Box 93374, 2509 AJ DEN HAAG, the Netherlands

	<p>Telephone number: (+31) - (0)70 - 888 85 00          Fax: (+31) - (0)70 - 888 85 01  <a href="https://www.autoriteitpersoonsgegevens.nl/en/contact">https://www.autoriteitpersoonsgegevens.nl/en/contact</a></p> <p>Ball &amp; Young Limited is a wholly-owned subsidiary of Vita (Group) Unlimited, which, in turn, is a wholly-owned subsidiary of Vita (Holdings) Limited, all companies being part of The Vita Group.</p> <p>Vita (Holdings) Limited is registered with the Dutch Data Protection Authority under FG number FG013627.</p>
<b>Purpose of the processing</b>	<p>Anonymous cookies allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.</p> <p>We use Google Analytics to better understand how visitors to the Vita Group website navigate to and through our website. We also use it to report on how long users spend visiting our content, and other metrics, such as how many of our site's visitors are new and where they are based. Google Analytics also helps us track the effectiveness of the money we spend on our digital marketing campaigns.</p>
<b>Legal basis for the processing</b>	<p>For cookies: consent, provided you have opted into cookies data capture.</p> <p>For queries or e-mails: if you have actively approached us regarding a product enquiry, business opportunity, or to raise any other query or matter, we shall hold and process your personal data such as e-mail address on a contractual obligations basis, legal obligations basis, and legitimate interest of processing your query or matter.</p>
<b>Categories of personal data</b>	<p>Online profiling user data: cookies.          Name, address, phone number or email address – only if this has been provided via our Contact Us page or via e-mail.</p>
<b>Any recipient or categories of recipients of the personal data</b>	<p>Marketing &amp; PR Manager, Legal Department, and/or relevant sales office if correspondence relates to a product enquiry.</p>
<b>Transfers of personal data to a third country</b>	<p>Not intended and not carried out.</p>
<b>Retention period</b>	<p>For anonymised cookies data: six years</p> <p>For all other product enquiries or matters, it shall be kept for six years in accordance with our document retention policy, or destroyed earlier if the matter has been resolved or closed earlier or no longer needed for the original purpose intended.</p>

<p><b>Data subject's rights</b></p>	<p>You may give your consent to this web site using cookies by accepting cookies. By clicking 'Accept', you explicitly consent to the use of cookies in accordance with this Cookies and Privacy Policy. You can change your settings at any time.</p> <p>For all other product enquiries or matters where you have provided us with contact information and personal data, you are entitled to the following rights as data subjects:</p> <ul style="list-style-type: none"> <li>• <b>Right to be informed</b> (of what data we hold, how long we hold it, for what purpose, etc.)</li> <li>• <b>Right of access</b> (you can make a subject access request at any time requesting what information we hold, what categories, storing for how long, etc.)</li> <li>• <b>Right to rectification</b> (if we hold any inaccurate or incomplete personal data)</li> <li>• <b>Right to erasure</b> (if you no longer want us to retain your personal data)</li> <li>• <b>Right to restrict processing</b> (if you want us to verify the accuracy of the data in the meantime)</li> <li>• <b>Right to data portability</b> (only where this is technically feasible and where processing is carried out by automated means)</li> <li>• <b>Right to object</b> (object to processing does not apply if you have consented to processing and have not withdrawn consent, or if we are processing for a legal obligation)</li> <li>• <b>Right to object to automated decision-making and profiling</b> (you may request for human intervention, request to express your point of view and obtain an explanation of the decision and to challenge it)</li> </ul> <p>Above examples included in the brackets are not an exhaustive list of examples on how and when to exercise your rights.</p> <p>Please write to the DPO should you wish to exercise any of your rights.</p>
<p><b>Your right to withdraw consent at any time, where relevant</b></p>	<p>You can block cookies by changing/disabling the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including session cookies) this may impede your usage of this site.</p> <p>For withdrawal of consent or object to processing of personal data, please write to the DPO.</p>
<p><b>Your right to lodge a complaint with a supervisory authority</b></p>	<p>You have the right, as data subjects, to lodge a complaint to the supervisory authority. In the UK, this is the ICO, Information Commissioner's Office. You may choose to contact a supervisory authority in another country provided: (i) you habitually reside there;</p>

	<p>(ii) you work there; or (iii) that country is the place of breach (if there is a breach).</p> <p>Should you have any queries or complaints, please first raise this to the DPO before contacting the supervisory authority or the Lead Supervisory Authority.</p> <p>In the UK, the ICO is contactable via <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or UK landline 0303 123 1113.</p> <p>In the EU, the Lead Supervisory Authority contact details are as above.</p>
<p><b>The source the personal data originates from</b></p>	<p>Cookies data originate from your access to our website: <a href="https://www.ballandyoung.com/">https://www.ballandyoung.com/</a>.</p> <p>If you have provided us with personal data to process an enquiry, matter, or complaint, the source of personal data will have come from you directly. We will process your personal data strictly based on responding or furthering your enquiry, matter, or complaint.</p>
<p><b>Provision of personal data reason</b></p>	<p>You shall have no obligation to provide us with any data, or personal data. Should you choose to do so, we shall process it in accordance with:</p> <ul style="list-style-type: none"> <li>• contractual obligations – for supply or purchase transactions or quotes;</li> <li>• legitimate interest – in order to respond or further your enquiry, matter or complaint.</li> </ul> <p>If you choose to disable cookies on our website, the website should continue to function, there are no obligations for you to accept cookies.</p>
<p><b>The existence of automated decision-making, including profiling, and information about how decisions are made, the significance and the consequences</b></p>	<p>We do not use automated decision-making and profiling. Data captured via activated cookies do not produce individual profiling but are reviewed as a whole for us to manually adjust or amend our website, e.g. moving certain functions or links around the website for better navigation and user experience.</p>