

Data privacy is important to Palestrina London. This Privacy Notice describes the personal information we collect about you as a visitor to our website, how we use it, with whom we share it, and describes your choices regarding certain types of processing. If you have any questions regarding this Privacy Notice, contact [sales@palestrinalondon.com](mailto:sales@palestrinalondon.com).

## Introduction

Palestrina London, Design Centre Chelsea Harbour, London, SW10 0XE, United Kingdom is committed to protecting and respecting your data privacy and your right to fair and just processing of your personal data. When you choose to provide us with data about yourself, we recognise that you trust us to act in a responsible manner.

This Privacy Notice sets out the basis on which your personal data will be processed by Palestrina London, the data controller of your personal data under the compliance requirements of the General Data Protection Regulation (EU) 2016/679. Please read the following carefully to understand our views and practices regarding your personal data and how it will be treated by us.

## Personal data we may collect about you

"Personal Data" means any information that identifies you directly or indirectly, including, without limitation, by reference to your name, e-mail address, login ID and other contact or location data or to one of more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity, that you voluntarily transmit with your communication to us.

We may collect the following types of Personal Data about you:

Device information: information such as what kind of browser a visitor is on, what operating system they are using, their IP address, cookie information, time stamp (time page accessed as well as time spent per web page) and their click through information (for example, which pages they have viewed and how long they have been there).

Contact details and Palestrina London account details: In certain sections of the website, it may invite you to contact us to place enquiries, request information or complete a trade registration form. We may ask for Personal Data to be entered as a means of registration before accessing a certain part of the website. Visitors of the website do not have an obligation to enter any of their Personal Data, but information will be required in order to provide our content and services.

Transaction information: The website may also collect Personal Data when you use certain Palestrina London services, through the use of the website, such as placing an order or simply enquiring about a service that we provide.

## What we use your personal data for

We may use data held about you in the following ways for the purpose of internal administration and to ensure that the content on this website is presented in the most effective manner for you and for your computer, and for further purposes described below:

- Personal data used
- Palestrina London Account Details
- Contact Details
- Transaction information

## Device information

### Purpose

- To allow us to verify your username and password when you are logging on to certain restricted areas of the website
- To register you to use Palestrina London services
- To contact you to deliver certain services or information you have requested
- To provide you with notices regarding our services
- And other processing necessary to fulfil a contract with you and in connection with our legitimate interest to provide services to you in an efficient, secure and personalised way.
- To improve the content and general administration of the website and our services
- To understand our visitors

And other processing necessary in connection with our legitimate interest to send you relevant information about our products and services, which may be subject to your consent where required by law, and to develop our content based on our users' interests

The website may process information that will be maintained, used and disclosed in aggregate form only, for example, without limitation, the total number of visitors to our website, the number of visitors to each page of our website, browser type, external Websites (as set out in section 7 below) linked to and IP addresses. Palestrina London may analyse this data for trends and statistics in the aggregate, and we may use such aggregate information to administer the website, track users' movement, and gather broad demographic information for aggregate use

We may also process your information for our legitimate interest to ensure the security of your user account and our business, to prevent or detect fraud or abuses of our websites, products and services, to implement and enforce our general terms and conditions of business or any other agreements concluded with you, and to administer technical aspects of our website, including troubleshooting, diagnosis of technical and service problems, testing, encryption and similar operations.

### Who we share your personal data with

We may share your Personal Data with the following parties:

Companies in the same group of companies as us: We may disclose your Personal Data to any member of our group which means any company or partnership which is wholly or partly owned by any of Palestrina London's general partners and any subsidiary or holding company of such company or partnership or any partnership of which such company is a partner (the "Turnell & Gigon Group").

Our outsourcing partners: Where we use suppliers, service providers and consultants in connection with our business activities, they may have access to your information, which they will process on our behalf.

Third parties: We will only disclose your Personal Data to third parties under the following conditions:-

If we are required to disclose or share your Personal Data in order to comply with any legal obligation or in order to enforce or apply our Terms and Conditions or any other agreement; or protect the rights, property, or safety of Palestrina London, our customers, or others. This includes

exchanging information with other companies and organisations for protection against credit risk and fraud;

in the event that we sell or buy any business or assets in which case we may disclose your Personal Data to the seller or buyer of such business or assets;

if Palestrina London or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will of course be one of the transferred assets; and/or with your specific consent either at the time you register with this website, or subsequently.

We do not disclose Personal Data to anyone else except as set out above.

### IP Addresses

We may collect information about your computer or device including where available your IP address, operating system and browser type for system administration. This is data about our users' browsing actions and patterns and may also identify any individuals.

### Where we store your personal data

In most cases any information that we receive will be transferred to us in the form of an email, when you may have completed a feedback form. It may also be stored within a record keeping area of the administrative side to our website to which we will refer when responding to an enquiry, sales enquiry, or order if appropriate. In these regards we have a legitimate purpose for retaining your information.

### How long do we keep Personal Data for?

We will keep your Personal Data for as long as is necessary in connection with the purposes set out above, or for as long as you are a client of Palestrina London. After our relationship is terminated we will keep your Personal Data for a reasonable period, to maintain our records in accordance with the law and our legitimate business needs. We may keep an anonymous form of your Personal Data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful reason to do so.

### Your right to unsubscribe (opt-out)

If you would like us to stop sending you marketing communications you may email us at [sales@palestrinalondon.com](mailto:sales@palestrinalondon.com) or use the unsubscribe link in our marketing communications. Although we encourage you to use the unsubscribe link because it is automated, you may also send us a request and message via our contact page form. If possible, please include a copy of the communication you received to help facilitate a timely and accurate removal.

### Your rights

This website may from time to time contain links to and from external websites, as well as our partner and/or affiliate websites. If you follow a link to their websites, please note that these websites will be covered by their own privacy notice (PN) and/or personal information collection statement (PICS). Palestrina London does not accept any responsibility or liability for protection of Personal Data which you may submit to a third party's website. We recommend that you check the wording of the relevant privacy notices before you submit any Personal Data to those websites.

Subject to certain provisions, you have the following general rights in relation to your Personal Data:

- the right to be informed about how your Personal Data is being used;
- the right to access the Personal Data we hold about you;
- the right to withdraw consent or opt-out of receiving direct marketing messages;
- the right to request the correction of inaccurate Personal Data we hold about you;
- the right to request the blocking or deletion of your Personal Data where the processing does not comply with applicable data protection laws;
- the right to object to processing activities, including where profiling activities occur;
- the right to request that our processing activities are restricted, where for example you have contested that the Personal Data held by us may be inaccurate;
- the right to contest a decision made regarding automated processing which significantly affects you;
- the right to receive the Personal Data that you have provided to us in an appropriate format with a view to transferring that Personal Data to a separate service provider; and
- The right to file a complaint with the UK Information Commissioner's Office (ICO) or your local data protection regulator, if you are unhappy with the way we are using your Personal Data. The contact number for the ICO is 0303 123 1113 or you can access their website via: <https://ico.org.uk/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below". We will generally aim to respond to enquiries within 7 days or sooner where required by law.

### Security of your information

We endeavour to protect your information through the measures set out below. Unfortunately, we cannot always guarantee complete security. Unauthorised entry or use, hardware or software failures, events outside our control and other factors, may compromise the security of your information. Nevertheless, we will comply with our obligation to implement appropriate technical and organisational measures to ensure a level of security of Personal Data appropriate to safeguard against the risks of a personal data breach.

### Children

Our website and services are not intended for children under the age of 16. If you are under 16, please ask your parent or guardian before using our website or services.

### Contacting us

We are here to help and encourage you to contact us first to resolve your complaint.

Please contact us at [sales@palestrinalondon.com](mailto:sales@palestrinalondon.com) with any questions or comments.

It is very important to us that your experience using [www.palestrinalondon.com](http://www.palestrinalondon.com) is positive. We respect your rights to privacy and the fair and just processing of your Personal Data.