

# GREENTHUMB PRIVACY POLICY

## 1. Background

Your personal data is of utmost importance to us.

We've developed this Privacy Policy ("Policy") to inform about what happens to any personal data that you give to us, or any that we may collect from or about you. We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. This policy applies to all products and services ("referred to in this policy as Services"), and instances where we collect your personal data.

We will take appropriate technical and organisational measures to safeguard your personal information.

This Policy applies to personal information processed by or on behalf of GreenThumb Limited and as we have franchised businesses all companies, businesses, partnerships and individuals trading as GreenThumb Lawn Treatment Service (referred to in this policy as "we" or "us" or the "GreenThumb family").

In this Policy we will:

- set out the types of personal data that we collect
- explain how and why we collect and use your personal data
- explain when and why we will share personal data within the GreenThumb family and with other organisations; and
- explain the rights and choices you have when it comes to your personal data.

Using our Services means:

purchasing our Services with us over the phone, in person, or online or otherwise using any of the websites or social media ("our Websites") or mobile applications where this Policy is posted.

Our Websites or mobile applications may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal data on a website as we do not accept any responsibility or liability for websites of other organisations.

## 2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our Services, if relevant, includes:

Personal and contact details, such as title, full name, gender, billing addresses, home addresses, email addresses, phone numbers and contact details history  
Information about your property and lawns, such as location, size, number of lawns, property type, images of your garden and layout of your garden area including any ornaments, ponds, animals or obstacles which are relevant to our Services and the health and safety of our staff

Details of beneficiaries, family members or tenants, such as if you pay or arrange for our Services on behalf of someone else whether a family member, friend, tenant or beneficiaries of our Services

Online contact such as details of the emails and other digital communications we send to you that you open, including any links in them that you click on and your username and password or when you speak with us through social media or online chat. We will be notified of any comments made on public platforms, including social media, that you may make about GreenThumb.

Records of your contact with us such as via the phone number of our Services and, if you get in touch with us online using our online services, details such as your mobile phone location data, IP address and MAC address

Products and services you purchase from us, as well as have been interested in and the associated payment methods used

Marketing to you and analysing data, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you. Offers may include our direct debit programmes or products and services which would benefit your lawns and any of our other products and services

Access information to your lawns, such as access codes for gates

Information about your use of products or services held with our business partners, such as lawn mower suppliers, tourist attractions and related products

We don't intend to process information about your health or of a family member or beneficiary unless it is provided to us for the purposes of making adjustments to the manner in which we provide our Services

Financial details about you, such as your payment method(s) and details of money you owe

Information about your property occupier status and use of the lawns, such as whether you are a tenant or are an owner occupier of the property where we deliver our Services

Your family, lifestyle or social circumstances, if relevant to our Services (for example, if you are a family or not) with reference to lawn usage

Feedback and contributions such as to customer surveys and questionnaires or regarding complaints through customer service

Insights about you and our customers gained from analysis or profiling of customers and the effectiveness of our marketing communications and downloads and access from our website content and online advertising.

### **3. What is the source of your personal information?**

We'll collect personal information from the following general sources:

- From you directly, and any information from family members, associates or beneficiaries of our Services
- Information generated about you when you use our Services including when you open an account
- From a referrer or other intermediary or partner who we work with to provide or improve our Services to you
- Business partners (for example, those with whom we are affiliated), account beneficiaries, or others who are a part of providing our Services or operating our business
- From other sources such as publicly available directories and information (for example, telephone directory, social media, internet, news articles). Please note that whilst we will put in place appropriate protection to make sure your personal data remains protected we cannot guarantee the security of any personal information you transfer over the internet to us
- We may buy or rent licenced software via a third party to obtain information about you or customers generally which specifically relates to demographic information, consumer spending habits, location data, socio economic data, online media channels, marketing information, publicly available information and other information to help improve our Services or our business.

#### **4. What do we use your personal data for?**

We use your personal data, including any of the personal data listed in section 2 above, for the following purposes:

- Manage your account with us and personalise your experience and communicate with you
- Contact you about our Services, for example by phone, email, SMS, online chat or post or by responding to social media posts that you have directed at us
- Process your orders, credits and refunds
- Assessing a request for our Services, including considering whether or not to offer you our Services, the price, the risk of doing so (for example assessing the safe access to your property to deliver our Services), availability of payment methods and the terms or making any requested changes to our Services or your data
- Managing any aspect of our Services
- For our suppliers to deliver and collect items from your property such as equipment and materials used in the delivery of our Services
- Updating your records, tracing your whereabouts and recovering any outstanding monies on your account
- To perform and/or test the performance of our products, services and internal processes
- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting

To monitor and to keep records of our communications with you and our staff (see below)

Help to develop, review and improve our product range, Services, information technology, systems, know-how and the way we communicate with you

For market research and analysis and developing statistics

Assessing and profiling aspects of your lawn

For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and services. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match). Offers may relate to any of our Services such as direct debit programmes and seasonal or climate or soil type related products and treatments as well as to any other offers and advice we think may be of interest

To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, online chat, offers, latest news and deciding which offers or promotions to show you on our digital channels

Using your online browsing behaviour as well as your purchases and online purchases to help us better understand you as a customer and provide you with personalised offers and services

To measure the effectiveness of our marketing communications

To comply with legal and regulatory obligations, requirements and guidance

To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve our Services or know-how, or to assess or improve the operating of our businesses

To share information, as needed, with business partners (for example insurers, solicitors), account beneficiaries, service providers or as part of providing and administering our Services or operating our business

To invite you to take part in and manage customer surveys, questionnaires and other market research activities carried out by us or other organisations on our behalf (unless you tell us that you do not want us to contact you for market research purposes)

To facilitate the sale or transfer of one or more parts of our businesses

To enable other businesses in the GreenThumb family to perform any of the above purposes

## **5. What are the legal grounds for our processing of your personal information (including when we share it with others)?**

We rely on the following legal bases to use your personal data:

*1. Where it is needed to provide you with our products or services, such as:*

a) Assessing a request for our Services, including to consider whether or not to offer you our Services, the price, the payment methods available and the conditions

to attach

- b) Managing our Services to you, or a request for our Services
- c) Updating your records, to contact you about your account
- d) Sharing your personal information with business partners and services providers when you request our Services to help manage your order, for example making arrangements for the supply and collection of materials from one of our partners at your home for a Lawn Makeover.
- e) All stages and activities relevant to managing our Services including enquiry, application, administration and management of accounts, quotes, requests for beneficiaries to receive our services, setting up/changing/removing details including of beneficiaries
- f) For some of our profiling and other decision making to decide whether to offer you our Services (for example depending on the layout of your property and the availability of safe access and egress), particular payment method and the price or terms of this.

*2. Where it is in our legitimate interests to do so, such as:*

- a) Managing our Services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for seeking payments (where appropriate)
- b) To perform and/or test the performance of our Services and internal processes
- c) To follow guidance and recommended best practice of government and regulatory bodies
- d) For management and audit of our business operations including accounting
- e) To carry out monitoring and to keep records of our communications with you and our staff (see below)
- f) To administer our good governance requirements, such as internal reporting and compliance obligations or administration required for auditing purposes
- g) For market research and analysis and developing statistics
- h) For direct marketing communications and related profiling to help us to offer you relevant Services, including deciding whether or not to offer you certain Services. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match)
- i) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or Services, helping us improve products or Services, or to assess or to improve the operating of our businesses
- j) For some of our profiling and other decision making
- k) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

*3. To comply with our legal obligations*

*4. With your consent or explicit consent:*

- a) For some direct marketing communications
- b) For some of our profiling and other decision making
- c) For some of our processing of special categories of personal data, such as about your health, or of a family member or beneficiary if relevant to making adjustments to the manner in which we provide our Services.

*5. For a public interest, such as:*

- a) Processing of your special categories of personal data such as about your health, or of a family member or beneficiary where it relates to making adjustments in the arrangements for our Services.

**6. When do we share your personal information with other organisations?**

We may share information with the following third parties for the purposes listed above:

Within the GreenThumb family and service providers

Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing our Services or operating our business

Governmental and regulatory bodies such as HMRC, Department for Environment, Food and Rural Affairs, Ombudsman, the Information Commissioner's Office and the Health and Safety Executive

Other organisations and businesses who provide services to us such as solicitors, back up and server hosting providers, IT software and maintenance providers (including for our website), document/data storage providers, payment processing, print and postal processing and suppliers of other back office functions

If we sell or transfer (or enter into negotiations to sell or transfer) any part of our businesses or any of our rights or obligations under any agreement we may have with you and to any successors in title to our business.

Consumer rights organisations

Marketing companies, market research organisations and insight companies who help us to develop and improve our communications and Services

Debt Collection and Recovery Solicitors

**7. Your rights?**

You have the right to:

Ask us to cease marketing communications to you (opt out)

Ask us not to process your personal information for marketing purposes at any time

Have any inaccuracies in your personal information held about you corrected

Ask us to delete your account permanently

Access a copy of the information we hold about you

We will make reasonable efforts to comply with your requests except where we are permitted or required to do so under applicable law. Requests are free of charge

however we reserve the right to charge a small fee to cover administrative costs should we consider any request to be excessive, unfounded or unreasonable.

## **8. Is your personal information transferred outside the UK or the European Economic Area?**

We're based in the UK and your personal information will be stored and processed in the United Kingdom and EEA. It may also be processed by companies operating outside of the EEA who work for us or for one of our service providers. We will put in place appropriate protection to make sure your personal data remains adequately protected and is treated in line with this Policy.

## **9. External service providers**

We may engage third party companies and individuals to facilitate our Services to you such as payment, delivery and collection of materials to and from your home, print and post, data storage or website related services such as referrals made by recommendations through our Recommend a Friend scheme. These third parties may have access to your personal information only to perform these tasks on our behalf and they are obliged through contract not to use your personal information for any other purpose or to disclose your personal information to any third party without our express consent.

## **10. What should you do if your personal information changes?**

We want to make sure that the personal data we hold about you is accurate and up to date and so if any of the details are incorrect you should tell us so that we can update our records using the details in the Update My Details section of our website. We'll then update your records if we can.

## **11. Do you have to provide your personal information to us?**

We're unable to provide you with our Services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

## **12. Do we do any monitoring involving processing of your personal information?**

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face-to-face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

## **13. For how long is your personal information retained by us?**

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations  
For as long as we provide products and/or Services to you and then for as long as someone could bring a claim against us; and/or  
Retention periods only for as long as necessary and in line with legal, accounting and regulatory requirements or guidance.

Your consent to the use of your personal information for such purposes remains valid after the termination of our relationship with you to the extent permitted by applicable law so long as you do not request otherwise, where permitted.

We may anonymise your personal data (in order that you can no longer be identified) for research or statistical purposes and under these circumstances we may retain this information indefinitely.

#### **14. What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from 25th May 2018.

The right to be informed about the processing of your personal information  
The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed  
The right to object to processing of your personal information  
The right to restrict processing of your personal information  
The right to have your personal information erased (the "right to be forgotten")  
The right to request access to your personal information and to obtain information about how we process it  
The right to move, copy or transfer your personal information ("data portability")  
Rights in relation to decision making which has a legal effect or otherwise significantly affects you.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

#### **15. Your right to object**

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests although we will be required to continue to process certain personal information in order to provide our Services to you and for legal reasons. You can contact us by going to the Update My Details section of our website to exercise these rights.

## **16. What are your marketing preferences and what do they mean?**

We may use your home addresses, phone numbers, email addresses and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication you receive.

## **17. Changes to this privacy policy**

We may change this privacy policy together with our terms and conditions from time to time by updating this policy. We encourage you to check this policy for changes whenever you visit our website <https://www.greenthumb.co.uk/privacy-policy>

### **Contact Us**

If you have any questions about this policy, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website <https://greenthumb.co.uk/contact-us> or by writing to the below address, marking it for the attention of the DPO.

Alternatively, you can write to GreenThumb Limited, Integra, Ffordd William Morgan, St Asaph Business Park, St Asaph, Denbighshire LL17 0JD marking it for the attention of the DPO.