



DATA PROTECTION POLICY

IN COMPLIANCE WITH GENERAL DATA PROTECTION REGULATION (GDPR)

All organisations that process personal data are required to comply with data protection legislation. This includes in particular the Data Protection Act 1998 and the EU General Data Protection Regulation. The Data Protection Laws give individuals certain rights over their personal data whilst imposing certain obligations on the organisation that process their data.

We respect your right to privacy. This privacy statement explains our policy regarding the collection, use, disclosure and protection of Personal Data. This privacy statement applies to the collection and use of Personal Data about you by Rahim Brothers Limited. In certain circumstances, we may provide you with additional information about our use of your Personal Data in specific circumstances, for example as part of a special offer or specific services. Since we regularly review our policies and practices, your comments are always welcome. We reserve the right to change this Privacy Policy at any time.

Our policy has been broken down to address the following headings:

1. Personal Data
2. Collection of Personal Data
3. Use of Personal Data by Rahim Brothers
4. Sharing of Personal Data and Cross-Border Distribution
5. Protection of Personal and Card Information
6. Rights over Your Data
7. Changes to this Policy
8. Contact Us
9. Data Protection Officer
10. Appendix

1. Personal Data

Personal Data is information relating to an identified or identifiable individual, such as a name, address, telephone number, e-mail address, debit/credit card number, Internet (IP) address and information about an individual's purchases.

Personal Data does not include "aggregate" information. Aggregate information is data we collect about a group or category of products, services or customers, from which individual customers cannot be identified. In other words, information about how you use a service may be collected and combined with information about how

others use the same service, but no Personal Data will be included in the resulting data. Likewise, information about the products you purchase may be collected and combined with information about the products purchased by others. Aggregate data helps us understand trends and customer needs so that we can better consider new products and services, and tailor existing products and services to customer desires.

2. Collection of Personal Data

We collect Personal Data when you:

- Sign up for our account membership (including information about your credit history that may be collected, used, or disclosed only upon your consent);
- Apply for credit purchases
- Contact us over the phone and place an order (for delivery and or pick-up)

We also take live video footage on our properties to protect the rights, property or safety of Rahim Brothers, its customers, employees, and or the public.

3. Use of Personal Data by Rahim Brothers

The Personal Data we collect is primarily used to approve your account membership and then it is used to process your orders, delivery and or transactions. Using of personal data is thus due to a contractual necessity and based upon our legitimate interest to service our customers' needs such as:

- Managing the provision of goods, services and privileges to you, including monitoring your account, processing exchanges or returns, to conduct a credit check if you choose to pay by cheque, to determine your credit status and for fraud detection and identification purposes;
- Managing invoicing, accounting and information security services related to our transactions with you;
- Protecting against harm to the rights, property or safety of Rahim Brothers, its customers, employees, and or the public;
- Send invoices and or other information related to your purchases, such as purchase confirmations or delivery schedules.

4. Sharing of Personal Data and Cross-Border Distribution

For clients in other EU states we share certain information to achieve the fulfilment of an order. We may provide necessary data to a third party in order to process a transaction or fulfil an order that you have placed with us. For example, if you place an order for delivery to Denmark, we would have the goods dispatched by a third party. As a result, we would have to share your billing/shipping address to fulfil your order.

5. Protection of Personal and Credit Card Information

We know how crucial it is to protect and manage your personal data. We have security measures in place to protect Personal Data from loss, misuse or alteration while it is under our control. We have set out the following measures to keep your data safe:

- We apply physical, electronic and procedural safeguards in collection with the collection, storage and disclosure of personal data;
- We use computer safeguards such as firewalls and data encryption to keep this data safe;
- Physical data is stored in locked cabinets which is only accessible by authorised and relevant personnel where we have 24 hours CCTV footage and manned security;
- We only authorise access to employees who need the data to carry out their responsibilities;
- We regularly monitor our systems for possible vulnerabilities and attacks;
- We ask for proof of identity before we disclose your personal data to you;
- We have our PCI DSS compliance validated annually as an information security standard.

6. Rights over Your Data

We shall provide any information relating to data processing to you in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. We may provide this information orally if you request for it.

Privacy Notices

Where we collect personal data from you, we will provide you with a privacy notice at the time when it first obtains the personal data.

Where we collect personal data other than from you directly, we will provide you with a privacy notice within a reasonable period after obtaining the data, but at the latest within one month. If we intend to disclose the personal data to a third party then the privacy notice will be issued when the personal data is first disclosed if not issued sooner.

Subject Access Request

You have the right to access your personal data that we hold about you. If you would like a copy of the personal data that we hold about you, you can email us at info@rahims.net.

Rectification

You have the right to ask us to rectify any inaccurate or incomplete personal data concerning an individual. If we have given the personal data to any third parties

we will inform those third parties that we have received a request to rectify the personal data unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however we will not be in a position to audit those third parties to ensure that the rectification has occurred.

Erasure

You have the right to ask us to erase your personal data. We shall only erase the data when we are no longer legally bound to hold on to it. If we receive a request to erase your personal data and we had previously given the data to any third party, we will inform the third party that we have received a request to erase the personal data, unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however we will not be in a position to audit those third parties to ensure that the erasure has occurred.

Restriction of processing

You have the right to ask us to restrict the processing of your personal data where:

1. You challenge the accuracy of the personal data;
2. The processing is unlawful and you oppose to its erasure;
3. We no longer need the personal data for the purposes of the processing, but the personal data is required for the establishment, exercise or defence of legal claims; or
4. You have objected to processing (on the grounds of a public interest or legitimate interest) pending the verification whether our legitimate grounds override yours.

If we have given the personal data to any third parties we will inform those third parties that we have received a request to restrict the personal data, unless this proves impossible or involves disproportionate effort. Those third parties should also rectify the personal data they hold - however we will not be in a position to audit those third parties to ensure that the rectification has occurred.

Data portability

You shall have the right to receive personal data concerning yourself, which you have provided us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller in circumstances where:

- The processing is based your consent or a contract; and
- The processing is carried out by automated means.

Where feasible, we will send the personal data to a named third party on the individual's request.

Object to processing

You have the right to object to your personal data being processed based on a public interest or a legitimate interest. You will also be able to object to the profiling of your data based on a public interest or a legitimate interest.

We shall cease processing unless we have compelling legitimate grounds to continue to process the personal data which override the individual's interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You also have the right to object to your personal data for direct marketing

Enforcement of rights

All requests regarding your rights should be sent to the Data Protection Officer.

We shall act upon any subject access request, or any request relating to rectification, erasure, restriction, data portability or objection or automated decision making processes or *profiling* within one month of receipt of the request. We may extend this period for two further months where necessary, taking into account the complexity and the number of requests.

Where we consider that a request under this section is manifestly unfounded or excessive due to the request's repetitive nature we may either refuse to act on the request or may charge a reasonable fee taking into account the administrative costs involved.

Automated decision making

We will not subject you to decisions based on automated processing that produce a legal effect or a similarly significant effect on yourself, except where the automated decision:

- Is authorised by law; and or
- The individual has given their explicit consent.

7. Changes to this Policy

We may change this Privacy Policy at any time, but will alert you that changes have been made by indicating at the top of the Privacy Policy the date it was last updated. We encourage you to review our privacy statement to make sure you understand how your Personal Data will be used. If we make a material change to how we use Personal Data and the new uses are unrelated to uses we disclose in this statement, we will communicate the changes in advance.

8. Contact Us

If you have any questions or concerns about this privacy statement or would like to contact us for any reason, you can:

- Call us at 020 8985 3335;
- E-mail us at info@rahims.net;
- Write to us at: Rahim Brothers Ltd., Atlas Wharf, 57 Berkshire Rd, London E9 5NB

9. Data Protection Officer

For any further queries on the data protection policy, you can contact our data protection officer at data.protection.officer@rahims.net.

10. Appendix

The following terms have been used in this policy:

'consent' means any freely given, specific, informed and unambiguous indication of an individual's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the *processing* of personal data relating to him or her;

'data controller' means an individual or organisation which, alone or jointly with others, determines the purposes and means of the *processing* of *personal data*;

'data processor' means an individual or organisation which processes *personal data* on behalf of the *data controller*;

'personal data' means any information relating to an individual who can be identified, such as by a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, *personal data*;

'processing' means any operation or set of operations performed on *personal data*, such as collection, recording, organisation, structuring, storage (including archiving), adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'profiling' means any form of automated *processing of personal data* consisting of the use of *personal data* to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

'pseudonymisation' means the *processing of personal data* in such a manner that the *personal data* can no longer be attributed to an individual without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the *personal data* are not attributed to an identified or identifiable individual;