

# **Booker Customer Privacy and Cookies Policy**

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Intended Audience: Public

# Privacy and cookies policy

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At Booker, we're working hard to serve our customers, communities, and planet a little better every day. To do this, we need to be able to offer you products and services that meet these goals. Looking after the data you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us, and that you understand how we use it to offer you a better and more relevant shopping experience.

This privacy notice covers the activities of Booker Limited, Makro Self Service Wholesalers Limited, Booker Retail Partners (GB) Limited, Booker Direct Limited and all trading styles of those companies, i.e. Best Food Logistics, Budgens, Londis, Premier and Family Shopper as well as the new online delivery service 'Scoot'.

The data controller is the relevant company whose services are being used (collectively referred to in this Notice as "Booker Group" or "we" "our" or "us")

## 1. Overview

At Booker, we're working hard to serve our customers, communities and planet a little better every day. To do this, we need to be able to offer you products and services that meet these goals. Looking after the data you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us, and that you understand how we use it to offer you a better and more relevant shopping experience.

When you shop or purchase goods with us online, via a national account, delivered service or in a branch, or when you communicate with us, we collect and create personal data about you.

Booker Group serve a variety of customers in different ways and this notice applies to you if you use our services.

To use our services, you must either be a business, trader or other organisation who wishes to use our services for the purpose of that business or enterprise and not for personal use, or you must be a Booker employee or family member (subject to our colleague terms and conditions for use).

Using our services means being a registered customer of Booker, Makro or Booker Retail Partners, Booker Direct through one or more of the following mechanisms;

- Cash and carry branches of Makro or Booker;
- Online or otherwise using any of the Websites ("our Websites" where this notice is posted)
- As a member of one of our symbol groups (Premier, Family Shopper, Budgens, Londis scheme ("Symbol Group"))
- As a member of a national account business
- A customer of Best Food Logistics
- As an approved Retail Partner of the rapid delivery service 'Scoot'

From time to time, we may be contacted by individuals who are not the account holder or card holder. In those circumstances we will gather specific information to address the query or issue (such as name, address and contact details).

This policy does the following:

- sets out the different ways you interact with us and the types of personal data that we collect.
- explains the reasons why we use the data we collect.
- explains when and why we will share personal data within the Booker Group and with other organisations.
- explains the rights and choices you have when it comes to your personal data (including your marketing and cookie preferences).

## 2. What does Booker know about me?

Booker will collect and create different types of data. These include the following broad types of data.

- **Aggregated data**

We try and remove personal data we don't need. If we remove enough personal data, it becomes anonymous. This means that you can't be identified.

We might also take data we hold and remove certain information and replace it with other non-identifying information, such as an ID number or reference number. This is an extra technique we use to protect data.

- **Identity and contact data (name, address, Booker account number)**

This is information that helps us identify who you are and how we can contact you. This includes your name, title, account number, address, email, and telephone number. It also helps us manage the account(s) you hold with us in branch and online, issue membership cards, process your orders and refunds, provide additional services (for Symbol, trade clubs or classic drinks customers), deliver goods to your premises and communicate with you in emergencies or in relation to a product recall.

- **When you register as a customer of a Booker group company we will collect (where applicable);**

- Your personal details, including the name of the proposed account holder, your business address, email addresses, date of birth, photo ID (in some cases), phone number and title
- The names and telephone numbers of any additional card holders
- You will be given an account number which identifies your customer account with us
- A username and password for logging into your account online.
- Trading names, including proof of trading address and sales information.
- Where applicable we are required to collect additional information for those customers selling alcohol in Scotland and Tobacco in England.

- **When you register as a Retail Partner for our Rapid delivery service Scoot, we will collect or process**

**(where applicable);**

- Your personal details, including the name of the business owner, your business entity type, your business address, email addresses, date of birth, directors' names (if applicable). VAT number, and if you are a limited company, your register company number and registered company address.
- If the business is operated as a sole trader or partnership then we will also require the home address, the full name the date of birth and National Insurance number or Tax identification number and country of issue if they live outside of the UK for all Business Owners
- Photo ID for merchant set up directly via a 3<sup>rd</sup> party provider DNA Payments , phone number and title
- A username and password for logging into your account online.
- Trading names, including proof of trading address
- Where applicable we are required to collect additional information for those customers selling alcohol in Scotland and Tobacco in England.
- Product details
- Sales information

- **Financial, ID - Identification information (passport, driving licence) and transactional data (purchase information, banking, and payment details) and credit references (where applicable)**

This is information about you, your bank account and payment card details, your credit history and other financial information via credit searches you have authorised as part of your application.

If you pay for your purchases in cash or where applicable receive payments in cash from the business (customer rebate schemes), if these meet the thresholds for Anti Money Laundering checks then we will also need to see, validate and take copies of your photo ID (and where applicable, photo ID of all beneficial owners of the business). as well as other identification documents such as utility bills may also be required.

This information along with information about your purchase of a product or service from us (this includes when, where, what and how you purchased that product or service), helps us ensure we are complying with the Anti Money Laundering regulations which are a statutory requirement in the UK. We produce invoices and statements and make them available online for you, including where we sent that product or service and any other benefits collected as part of the transaction), this is to ensure we are compliant with HMRC VAT requirements. Any financial data about you and your business helps us to consider any application for credit, use as evidence of identity for high cash transactions and for the granting and maintaining of any credit.

- **User and interaction data (how you interact with products and services, delivered, online and in-branch)**

User data is information collected about you as a user of our branches, products, and services. This may include where you engage with us in a survey; provide feedback on your shopping experience; are captured by CCTV or other camera technologies, or number plate recognition.

We'll also collect information about you that allows us to create an analysis of you as a customer. This is to better judge what products and services to offer you.

Interaction data is information about how you interact with our products and services, namely what you click on and interact with on our sites and app, or products in-branch. This includes data about the order and time you scan products when using our Scan as you Shop service in branches.

- **Marketing data**

This is information about your marketing preferences and your interaction with online marketing. For example, we can see when you open marketing emails and/or what app marketing messages from Booker (you can opt out of marketing at any time by telling us). This also includes if you interact with adverts from Booker while browsing the internet. This enables us to judge its effectiveness when we compare your interactions with what you've purchased.

- **Location data**

In some cases, our Scoot App might ask for your location information to better serve you information about your local branch/site. If we're collecting this data, we'll make you aware of this at the time.

We also collect and process location data about you and your business to enable us to deliver goods to you throughout distribution centres and branches.

- **Technical device data**

This is information about the device you use to access our websites and the Scoot App. This could be information that identifies your device, its operating system, internet address, your sign-in data, browser and

plug-ins, location, where you came to our site from and where you go when you leave, as well as how often you visit. This is done via the use of cookies, which is covered further down in this notice.

- **Special category data**

This is special information that the law says is more sensitive (sometimes it's referred to as 'sensitive personal data') and it needs more protection.

For Booker Group, if we collect sensitive personal data in our interactions with you (for example, if you're making a complaint to us, or reporting an accident), we'll clearly explain what we're doing, and we'll only collect the data with your consent.

## **a Why do you need to know this about me?**

We've carefully considered the reasons for collecting and/or creating this data. Here's a summary of when and why we believe it's appropriate.

### **To make our services available to you**

This means that processing your personal data allows us to:

- I. manage the accounts you hold with us, including your credit account and high cash transactions.**
- II. process your orders and refunds.**
- III. produce invoices and administer any Spend and Save or any other loyalty scheme.**

### **Why do we process your personal data in this way?**

We need to process your personal data so that we can manage your customer accounts, provide you with the goods and services you want to buy, and help you with any orders and refunds you may ask for.

### **Why we're using this data (legal basis)**

- Contractual necessity – at the time we collect it (purchase data, contact details, delivery/collection details)
- Legitimate interests – following fulfilment of your order.
- Consent – when considering credit applications.
- Legal obligation – for any high cash transactions

We won't be able to provide you with your products or services if you don't provide us with this data.

### **To manage and improve our day-to-day operations.**

- I. Help to develop and improve our product range, services (digital and physical), branches, distribution centres, information technology systems, know-how and the way we communicate with you.**

### ***Why do we process your personal data in this way?***

We rely on the use of personal data to carry out market research and internal research and development. It also helps us to improve our information technology systems (including security), our product range, services, distribution centres and branches. This allows us to serve you better as a customer.

## **II. Detect and prevent fraud or other crime.**

### *Why do we process your personal data in this way?*

It's important for us to monitor how our services are used to detect and prevent fraud, other crimes, and the misuse of services. This helps us to make sure that you can safely use our services.

### **Why we're using this data (legal basis)**

- Legitimate interests

## **To personalise your Booker experience**

### **I. Manage and improve our websites and mobile app.**

#### *Why do we process your personal data in this way?*

We use cookies and similar technologies on our websites and mobile app to improve your experience. Some cookies are necessary so you shouldn't disable these if you want to be able to use all the features of our websites and mobile app. You can disable other cookies, but this may affect your experience. For more information about cookies and how you can disable them, see **the cookies and similar technologies section**.

### **II. Use your online browsing behaviour, as well as your in-branch and online purchases (including invoices and transactions), to help us better understand you as a customer and provide you with personalised offers and services.**

#### *Why do we process your personal data in this way?*

We use basic data about your general shopping habits (and those of similar businesses) to group customers into different segments such as 'Caterers'. This allows us to personalise our offers and services for you (including in our marketing communications).

### **III. Provide you with relevant marketing communications, relating to our products and services, and those of our suppliers, partners and the Booker Group.**

If we or our supplier partners run online advertising, this may be displayed on websites across the Booker Group, non-Booker websites and other media platforms (including such as Facebook, X and TikTok).

We may also measure the effectiveness of this advertising. To do this, we may use certain basic data about your in-branch and online purchases (for example if you bought a particular product that was featured in an advert). However, we limit this to what is necessary, and it is always obscured or anonymised to protect your identity. When we share your data in this way, it won't be used by those platforms for their own purposes and will be deleted shortly after.

#### *Why do we process your personal data in this way?*

We want to make sure that we provide you with marketing communications, including online advertising, that are relevant to your interests. To achieve this, we measure your responses to marketing communications relating to products and services that we and our partners offer. This means that when you're offered products and services, they best meet your needs as a customer.

#### **Why we're using this data (legal basis and consent)**

We will send you relevant offers and news about our products and services in several ways including by email, text and WhatsApp where you have provided consent (if applicable) or alternatively where we have collected your contact details as part of a sale where you have not otherwise opted out to receive these marketing communications (Legitimate interests)

#### **Changing your preferences**

You can change your marketing preferences with us at any time by either notifying us by email, following the opt out/unsubscribe instructions found on all electronic communications that we send to you via Text, WhatsApp, Email or telephone or at a local branch. You can also manage your marketing preferences through your online account with us if you have one.

### **To contact and interact with you**

#### **I. Contact you about our services, for example by phone, email, or post, or by responding to social media posts that you've directed at us.**

##### *Why do we process your personal data in this way?*

We want to serve you better as a customer, so we use personal data to provide you with clear information or help in response to your communications.

#### **II. Manage clubs, promotions and competitions you take part in.**

##### *Why do we process your personal data in this way?*

We need to process your personal data, so that we can manage the clubs, promotions and competitions you choose to enter including those we run with our supplier and other third parties.

#### **iii. Invite you to take part in and manage customer surveys, reviews and other market research activities carried out by the Booker Group and by other organisations on our behalf.**

##### *Why do we process your personal data in this way?*

We carry out market research including using a 3<sup>rd</sup> party to improve our services. However, if we contact you about this, you don't have to take part in the activities. If you tell us that you don't want us to contact you for market research, we'll respect your choice. This won't affect your ability to use our services.

#### **Why we're using this data (legal basis)**

- Legitimate interests



## To resolve legal claims or disputes

### *Why do we process your personal data in this way?*

This might be needed if you have an accident or there's an incident at our branches, for example. This could include medical reports.

### **Why we're using this data (legal basis)**

- Bringing or defending legal claims

## To use CCTV to protect our colleagues, customers, members of the public and property to prevent and detect crime and anti-social behaviour.

If you park in our car parks, we may use Automatic Number Plate Recognition Technologies (ANPR) to identify if your vehicle has complied with our parking rules. Where there's a security or claim incident involving a vehicle, we may use CCTV and or ANPR to assist in our investigation into those incidents.

We also use body-worn cameras and vehicle cameras to protect our colleagues and customers, and record footage in the same way as we do with other forms of CCTV.

### *Why do we process your personal data in this way?*

To protect our business, the local community, customers, and colleagues.

### **Why are we using this data (legal basis)**

- Legitimate interests
- Exercising our legal rights

## To use the Booker Rapid delivery App 'Scoot'

If you register and are successful in becoming a Retail Partner for Scoot Rapid delivery, we need to process your personal data so that we can;

- a Provide and set up the Scoot Retail partner accounts to allow consumers to place order directly with you, the Retail Partner for delivery,
- b provide you with the Retail Partner Admin Web portal to enable you to list products to sell to consumers directly via Scoot and manage settings such as availability times, pricing, delivery charges etc.
- c general admin, site controls and management of the Scoot App and platform.

### **Why are we using this data (legal basis)**

- Contractual necessity – the processing is necessary for the Scoot contract that you have entered
- Legitimate interests – for the ongoing use, maintenance and support of the Scoot App and Retail Portal

- Consent – when new Retail Partner account applications.
- Legal obligation – for complying with HMRC under the Organisation for Economic Development (OECD)

You as a Retail Partner will be the data controller for the purposes of;

- a agreement to supply goods to a consumer placed and paid for via the Scoot App including communications of out of stocks and substitutions,
- b Invoicing consumers
- c Delivery of the goods to the consumers including age verification checks
- d Communicating with the consumer on any queries, recalls or complaints.

## Why are you allowed to use my data in this way?

Whenever an organisation uses data, they must have a reason to use it. The law gives certain reasons for the use of data and Booker will always use data according to one of those reasons. In the section ‘Why do you need to know this about me’ we’ve stated the different reasons that we might hold data.

In this section, we explain why we think those reasons are suitable and what this means for you.

There’s often a focus on consent to use personal data but, in many circumstances, consent wouldn’t be appropriate. For example, a shoplifter withdrawing consent to be filmed with CCTV would increase risk to you and our colleagues; or for example a customer withdrawing consent to process their payment information, would increase the risk to our business.

Therefore, in many situations, Booker relies upon other legal reasons. For example, needing data to fulfil a ‘contract’ with you. At the point of you buying goods and services from Booker, a contract is created and any data we collect to allow us to deliver or provide those services or goods can be used and kept making sure we fulfil our contract.

Another reason is called ‘legitimate interests. This is when there are legitimate and reasonable reasons when Booker might collect and use data. For example, collecting information through our website is beneficial to both Booker and you because we can understand what products you’re interested in and make sure the products we offer match that need.

Our use of your personal data when based on ‘legitimate interests’ are to:

- meet our customers’ needs, including delivering our products and services.
- promote and market our products and services, and those of our partners and service providers.
- service your account (such as your Booker account), manage complaints, and resolve any disputes.
- understand our customers including their patterns and behaviours, as well as their likes and dislikes.
- protect and support our business, colleagues, customers and shareholders.
- prevent and detect anti-social behaviour, fraud and other crime.
- test and develop new products and services as well as improve existing ones.

We’ve assessed these fundamental reasons against the fundamental rights and freedoms provided to you under the law and balanced them up against the benefit both you and Booker might receive from this data being used.

## Data collected from third parties

We may also use personal data from other sources, such as specialist companies, media partners, suppliers and public registers (such as the electoral register and companies house).

When we work with specialist companies that provide us with personal data about you, they'll have told you about this data sharing at the time it was collected. We use this and our own data to better understand our customers.

We also use this personal data to make sure we have up-to-date details about you. We don't give personal data we've collected or created from you back to these companies.

## Members of the public

From time to time, we may be contacted by individuals who are not the account holder or card holder.

In those circumstances we will gather sufficient information to address the query or issue (such as name, address and contact details). In some case's we may need to pass that information on to a third party, such as a supplier (in the event of a product related query) or a third party advisor to address the matter in question. Any information obtained will be processed purely for the purpose of the single issue or query raised and will be deleted in line with our retention policy once the matter has been closed.

We may also capture data of members of the public on our CCTV surveillance systems, this is to protect our business, the local community, customers, and colleagues. Please see section 3 for more information.

## How does Booker look after my data?

We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place.

- We make sure staff are trained and rules are in place to make sure that data is used properly.
- We have physical protections and digital/electronic systems in place to keep what we hold secure.
- When data is moved or transferred, we make sure it's encrypted (scrambled)
- We use computer safeguards such as firewalls and data encryption to keep this data safe when it's not being moved.
- We only allow access to authorised colleagues and trusted partners.
- We regularly watch our systems for possible weaknesses and attacks, and we carry out tests (penetration testing) to see what can be improved.
- We'll ask for proof of identity before we share your personal data with you.
- We'll reveal only the last four digits of your payment card number when confirming an order.

Your personal data may be transferred outside the UK. It may also be processed by companies outside the UK who work for us (or for one of our service providers). When we do this, your personal data will be subject to appropriate protections. If we do transfer personal data to outside of the UK, it'll be protected in the same way as if it was being used in the UK. To do this, we use one of the following safeguards:

- We transfer to a non-UK country whose privacy laws ensure an appropriate level of protection for personal data.

- We put in place a contract with a third party that means they must protect personal data to the same standards as the UK.
- We transfer personal data to organisations that are part of specific agreements on cross-border data transfers with the UK.
- We complete a transfer risk assessment before agreeing to transfer data to any organisation who are in a country that does not have specific cross border arrangement and only if we decide the risk is low, we will progress and ensure we put in place an International Data sharing agreement with those organisations alongside a contract so that they protect the data to the same standards as the UK.

## Do you keep my data forever?

We won't keep your personal data longer than we need to. In most circumstances, this means we won't keep your personal data for more than 7 years after the end of your relationship with us. For certain data sets, we have the following specific retention periods:

- Information about purchases and the payment information relating to those purchases might be kept for up to 7 years after the transaction to allow us to meet statutory financial reporting requirements in areas such as VAT returns, Anti money laundering, investigate fraud and handle legal claims
- Customer complaints and feedback will be deleted 4 years after the date of the last communication
- Information you submit when participating in research panels/market surveys will be deleted 3 years after its creation.
- CCTV data will be kept no longer than 1 month after its creation, unless footage has been retained as part of a legal claim, accident, or criminal investigation.
- Health and safety records (for example, incident reports) will be deleted 7 years after their creation.
- Where your personal data is needed because of a serious dispute (such as litigation) or investigation, your personal data will be deleted 7 years after the matter is closed.
- When a customer has not shopped with Booker for 2 years or more, the account will be closed and can no longer be used, and any personal data held will be anonymised.

## Do you share my data?

We may share personal data with other organisations (including other Booker companies, Group companies and partners as listed below) in the following circumstances:

- To deliver the products and services we have offered to you.
- Offer products, services that may be of interest to you and your business or organisation.
- To central billing and marketplace suppliers who will need you information to deliver goods and to communicate directly with you about your order or delivery or cellar management services.
- With our wholesale and central billing suppliers and service providers (as explained below in section 10)
- We may share personal information of symbol group members, trade club members or other customer groups, to suppliers or federations to verify purchasing habits, membership, promotions and range compliance and other information with a view of obtaining benefits which can be passed onto those customers.
- Enable third parties to market their goods and services to you in accordance with your marketing preferences.
- To companies undertaking market research, surveys or gathering other industry related information relating to the services we provide your business.
- To the main account business, where you are a member of a national account.

- We may share personal data with other organisations in the following circumstances;
  - If the law or a public authority says we must share the personal data.
  - To establish, exercise or defend our legal rights or we need to by law (this includes for the purposes of preventing fraud and reducing credit risk).
  - To investigate or manage any complaints that you may have about deliveries, products or services.
  - Where we restructure, sell, or transfer our business (or a part of it). For example, in connection with a takeover or merger.
  - To any company within our parent's company group of companies (see section 11 "What about other companies in the Tesco/Booker Group below for more details")

## Service providers

These are organisations that help us to deliver and improve the services we offer to you. For example:

- technology and data services (such as storing, combining, and analysing data, and processing payments, and credit checking)
- fulfilment of orders
- Payment providers such as World Pay
- legal or other professional services
- those who provide services on our behalf such as erecting signage, supporting with merchandising, sending communications on our behalf, managing website services or conducting market research.

We only share personal data that enable our service providers to provide their services and they only use it for purposes agreed with us. We may also combine service providers data with data held by Booker to understand your purchases and interactions with us better.

## What about other companies in the Tesco/Booker Group?

Booker Limited, Makro Self Service Wholesalers Limited, Booker Retail Partners (GB) Limited, Booker Direct Limited and Venus Wine and Spirit Merchants Plc are all part of Booker Group. We may share personal data we collect with other companies in Booker Group. For example, we may share your customer data amongst other Booker Group companies to enable us to deliver your goods and services from the most convenient location to you.

Booker is part of the Tesco Group, which includes companies such as Tesco Stores limited, Tesco Bank, Tesco Mobile, dunnhumby, One Stop and Tesco Business Solutions. Data sharing is needed and essential for several reasons including corporate governance, provision of services, as well as achieving effective business management. An overview of why we share data with our Group companies is below;

### Venus Wines & Spirits

Venus Wines and Spirits are part of Booker Group and consists of a Wines and spirits retail store 'Gerry's and a wines and spirits wholesale business 'Venus Wines and Spirits' There are synergies and benefits from working with Venus Wines and Spirits for both Booker and our customers.

Sharing data with Venus helps our customers access a wider range of products. To find out more about what [Venus Wines and Spirits](#) and [Gerrys](#) do, click on the links.

## **dunnhumby**

dunnhumby, part of the Tesco Group, is also one of our service providers. dunnhumby help us to use personal data and product data to help improve our understanding of customers and personalise your customer experience. Find out more about what [dunnhumby](#) do.

## **Tesco**

Tesco part of Tesco PLC, provides retail goods to customers as well as providing the following services to Booker Group:

- Central Management and Business Services
- Technology and IT Services
- Financial and Tax Services
- Licensing, Legal and Compliance Services

These services involve the collection and processing of Booker Group's suppliers', customers' and colleagues' personal data and systematic sharing between the different parties. For the avoidance of doubt, none of your product order data is shared with or used by the wider Tesco Group outside of the Booker Group."

Sharing of personal data is undertaken to achieve sound corporate governance, effective business management and legal compliance. Find out more about what [Tesco](#) do, click on the link.

## **Tesco Bengaluru (Tesco Business Solutions)**

Tesco Bengaluru part of the Tesco PLC, provides following services to Booker Group:

- Central Management and Business Services
- Legal and Compliance Services
- Technology and IT Services
- Financial and Tax Services

These services involve the collection and processing of Booker Group's suppliers', customers' and colleagues' personal data and systematic sharing between the different parties.

Sharing of personal data is undertaken to achieve sound corporate governance, effective business management and legal compliance. Find out more about what [Tesco Bengaluru](#) do, click on the link.

## **Tesco Insurance, Tesco Mobile, One stop**

We do not share any customer data with these group companies currently.

# Cookies

We use cookies and similar technologies, such as tags and pixels ('cookies'), to personalise and improve your customer experience as you use our websites and mobile app, and to provide you with relevant online advertising. This section provides more information about cookies, including how we use them and how you can make choices about our use of cookies.

## How we use cookies

Cookies are small text files containing a unique identifier, which are stored on your computer or mobile device so that your device can be recognised when you're using a particular website or mobile app. Some cookies may be used only for the duration of your visit, and others may be used to measure how you interact with services and content over time. Cookies help to provide important features and functionality on our websites and mobile app, and to improve your experience. Cookies can also be used to help us detect fraudulent activity or to prevent security breaches, so we may record information about your device within the cookie. The reasons we use cookies are;

### Improve the way our websites and mobile apps work

- Cookies allow us to improve the way our Websites and Mobile Apps work, so that we can personalise your experience and allow you to use many of their useful features. For example, we use Cookies so we can remember your preferences and the contents of your shopping basket when you return to our Websites and Mobile Apps.

### Improve the performance of our websites and mobile apps

Cookies can help us to understand how our Websites and Mobile Apps are being used, for example, by telling us if you get an error messages as you browse.

These Cookies collect data that is mostly aggregated and anonymous.

### Deliver relevant online advertising

We use Cookies to help us deliver online advertising that we believe is most relevant to you on our websites and other organisations' websites and using social media.

Cookies used for this purpose are often placed on our websites by other companies providing specialist services to us. These Cookies may collect information about your online behaviour, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. This means that you may see our adverts on our websites and on other organisations' websites. You may also see adverts for other organisations on our websites.

### Measuring the effectiveness of our marketing communications, including online advertising

Cookies can tell us if you have seen a specific advert or message, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

A list of the cookies we use can be found here; [to be amended based on what each website uses]

Essential

Essential cookies enable core functionality such as security, network management, and accessibility. You cannot turn these off here or the site won't work properly. You can change them by changing your browser settings or , but this will affect the way the website works.

We use these cookies for things like:

Security, Signing in, Site errors, Storing products in your trolley, Making payments

Name	Provider	Purpose	Expiry	Type
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Preference

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

Name	Provider	Purpose	Expiry	Type
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Statistics

We use Google Analytics cookies to help us improve our website by collecting and reporting information on how you use it. The cookies collect information but do not directly identify anyone.

Name	Provider	Purpose	Expiry	Type
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Marketing

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Name	Provider	Purpose	Expiry	Type
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Unclassified

Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

Name	Provider	Purpose	Expiry	Type
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Your choices when it comes to Cookies

Web browser cookies



You can use your browser settings to accept or reject new cookies and to delete existing cookies. You can also set your browser to notify you each time new cookies are placed on your computer or other device. You can find more detailed information about how you can manage cookies through your browser's help function.

If you choose to disable some or all cookies, you may not be able to make full use of our websites. For example, you may not be able to add items to your shopping basket, proceed to checkout, or use any of our products and services that require you to sign in.

**To manage your cookies, click here....** [Insert cookie bot link]

## **What rights do I have (including subject access)?**

### **Subject Access**

You have the right to see the personal data we hold about you. This is called a Subject Access Request or SAR.

If you'd like a copy of the personal data we hold about you, please email us [DSAR@booker.co.uk](mailto:DSAR@booker.co.uk)

### **Inaccurate data**

If you believe we hold inaccurate or incomplete data, please let us know and we'll correct it.

### **Withdrawal of consent**

Where you gave us, information based upon your consent, if you withdraw that consent, we'll stop using that data.

### **Objection to our use of your data**

We'll consider your objection to our use of your personal data. If, on balance, your rights outweigh our interests in using your personal data, then you can ask us to either restrict our use of it or delete it. In almost all cases relating to marketing, we'll stop using that data at your request.

### **Restriction to use your data**

There are several situations when you can restrict our use of your personal data. This includes (but is not limited to):

- You've successfully made a general objection (as above)
- You're challenging the accuracy of the personal data we hold
- We've used your personal data unlawfully, but you don't want us to delete it

### **Deletion**

There are several situations when you can have us delete your personal data. This includes (but is not limited to):

- We no longer need to keep your personal data
- You've successfully made a general objection (as above)

- You've withdrawn your consent to us using your personal data (and we don't have any other grounds to use it)
- We've unlawfully processed your personal data

### **Complain to the data protection regulator (ICO)**

We'd like the chance to resolve any complaints you have. However, you also have the right to complain to the UK data protection regulator (the 'ICO') about how we've used your personal data.

### **More information on your data protection rights**

The ICO website also contains more detail on the data protection rights mentioned above, or if you'd like to speak to us about these rights in more detail, see the 'how to contact us' section below.

## **How can I contact Booker about my data?**

We want to ensure that the personal data we hold about you is accurate and up to date, if any of the details are incorrect, please let us know and we will amend them.

If you have any questions, wish to exercise any of your rights or have any complaints about how Booker uses your personal data, please contact us.

**Phone:** 01933 371000

**Mail:** Booker Group, Head of Data Privacy & Risk (Registered Data Protection Officer), Equity House, Irthlingborough Road, Wellingborough, Northants. NN8 1LT

**Email:** [DPO@booker.co.uk](mailto:DPO@booker.co.uk)

We reserve the right to make changes to this Privacy Notice from time to time, so please take time to review this periodically.

Reviewed and Updated: February 2025