

Please take time to read and understand our Privacy Policy which is issued by Fine Grade Ltd, who's registered address is Fine Grade Ltd, Peterborough. These policies apply to "Fine Grade", the website and platform "finegrade.co.uk", and any sub-domain or any "App" we may attach to our business platform. By continuing to use our website, sub-domains and or Apps you are agreeing to our terms and have fully understood our Privacy & Data Handling policy.

We provide services including but not limited to, Internet web sites, personal introductions between members, e-mail functions, electronic management tools and other business services. We are committed to safeguarding your privacy online and created this Privacy Statement in order to demonstrate our best intentions in protecting the online privacy of users of our services.

By using our Services you consent to our gathering, use and disclosure of your information, as described in this Privacy Statement, the Terms of Service and the other documents, agreements and materials incorporated therein (collectively referred to as the Rules). This Privacy Statement may change from time to time and we will provide notice of changes as described in the Terms of Service.

Questions regarding this Privacy Statement should be sent to: The Controller of Data listed in this document.

In this Privacy Statement we aim to explain the following:

- (a). What information does Fine Grade gather?
- (b). How does Fine Grade gather information?
- (c). How does Fine Grade use the gathered information?

(d) With whom does Fine Grade share information we gather?

(e) How may you access or update stored information about you?

(f). How does Fine Grade protect your personal information?

(g). Use of Cookies; E-mail Pixels.

4.0. What information does Fine Grade gather?

When ordering or registering on our site, as appropriate, you may be asked to enter your: name, e-mail address, mailing address or phone number. You may, however also visit our site anonymously. Like most websites, we use cookies to enhance your experience, gather general visitor information, and track visits to our website. Please refer to the 'do we use cookies?' section below for information about cookies and how we use them. Fine Grade gathers

information about you and your use of the Services as set forth below.

4.1. Information about you. Fine Grade collects personal information about you including, without limitation, personally identifiable information (such as your name, address, phone number and e-mail address) and some financial information (such as limited aspects of your credit card information for any rolling or repeat subscription services). For some of our Services we may also ask other information about you such as your age (as a security measure) or other demographic information. Fine Grade may also collect your contact information and correspondence if you contact us by e-mail or letter.

4.2. We do not store or retain your full credit or debit card details. When payment is made you will transact directly with your card issuer and will be subject to their

own particular Ts&Cs and privacy policies. We only supply the barest details of your card to effect card processing payment to take place during temporary communication through our platform with your card processor and our payment processing provider.

4.3. Information about your use of the Services. Fine Grade collects information about your use of the Services including, without limitation, data about your computer (such as operating system type, browser type, software installed on your computer) and your web browsing information (such as referring URL`s as well as your IP address).

4.4 We may send you periodic emails. The email address you provide for membership or for any order processing, will only be used to send you information and updates pertaining to your order or request.

If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, etc. Please note, that if at any time you would like to unsubscribe from receiving future emails from us, we include detailed unsubscribe instructions at the bottom of each email. If at any time you would like to unsubscribe from receiving any future emails or contact, you can email us on unsubscribe@greycoffee.co.uk and we will promptly remove you from ALL correspondence. Please be aware that if you do unsubscribe, we will not be able to contact you in relation to your account or transactions or subscriptions or messages from other users/ members.

5.0. How does Fine Grade gather information?

5.1. Fine Grade gathers information that you submit on any Fine Grade registration forms, surveys, questionnaires or other online forms. Fine Grade gathers information about your use of the Services during such use, and you should understand that you are not anonymous to us.

5.2. Fine Grade may also gather new information or update information from other sources including, for example, verifying and updating your address using third party services, using various methods to update your credit card expiration date or collecting information from our business partners.

5.3. Fine Grade does not sell your personal information or allow access to your data to or by any third party.

6.0. How does Fine Grade use the gathered information?

6.1. Fine Grade uses your information to make your use of the Services more personalised and convenient. We use your information to display or deliver materials, such as e-mails, surveys, communications and content. Fine Grade may use your information to target such materials so that they may be more relevant to you than materials that would be provided without the use of your information. We may use your information to make online transactions more convenient for you, such as pre-filling online forms that you may submit to us or, for some of our Services. You will have the option to opt-out of any communications or the like at the footer of each communication we send you. This is all aimed at assisting you to best manage the use of our services.

6.2. Fine Grade uses your information to conduct and provide our own market and demographics research and data analysis services. Fine Grade may also share the information with any sister companies we may have, in order to provide tailored offers and services. You can opt out of this service if you wish to on registration.

6.3. Fine Grade uses your information to provide, support and maintain the Services including, for example, to monitor and diagnose the Services, to provide technical support, to bill you for the Services and to contact you with respect to the Services or other Online Web Services products or services.

7.0. With whom does Fine Grade share information we gather?

7.1. Fine Grade may share your information with our partners.

7.2. Fine Grade may share your personally identifiable information with third parties that provide services on behalf of Fine Grade. Such third parties do not have the right to use your information for any purpose other than to provide the applicable service.

7.3. Fine Grade may share your personally identifiable information with its affiliates that protect your personally identifiable information from disclosure such as our payment processing provider, any relevant government agencies and data protection agencies.

7.4. Fine Grade may disclose your personally identifiable information, any communications sent or received by you, and any other information that we may

have about your account as follows: as may be required by law, regulation, rule or court order; pursuant to requests from governmental agencies or law enforcement authorities; as necessary to identify, contact or bring legal action against someone who may be violating the Rules; to operate the Services properly; or to protect Fine Grade, our members or other third parties including, without limitation for data breaches and other emergency situations. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

7.5. Third Party Sites and Co-Branded Services.

7.6. Fine Grade may advertise, promote, reference, recommend or provide links to third party sites, services and products. Any third party sites we promote might have their own privacy policies, which may not comply with this Privacy Statement, even if the site, service or product is branded with Fine Grade logo or name. Fine Grade IS NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OF SUCH THIRD PARTIES OR ANY OTHER THIRD PARTIES. We recommend that you review the privacy policies of any such third parties or links.

8.0. How may you access or update stored Information about you?

8.1. You may review and update your information stored as a part of your account by contacting our company and requesting such information.

9.0. How does Fine Grade protect your personal information?

9.1. All of your account information is password protected for your security. Your billing information is transmitted and displayed using industry-standard SSL encryption. While Fine Grade believes that it has implemented reasonable security, we cannot guarantee that our security measures will prevent unauthorised third parties, such as hackers or Phishers, from obtaining or accessing your information.

10.0. Use of Cookies; E-mail Pixels.

10.1. Fine Grade uses a cookies feature of your Web browser to automate certain aspects of our Web site. Cookies are very small files that are stored on your

computer and that enable us to recognize your computer each time you return to our site. By using cookies, Fine Grade can keep track of your preferences, what you have already seen on our site and what you haven't, and any personalisation you've done, without requiring you to enter a password every time you come back. Fine Grade uses any information gathered using our cookies in compliance with this Privacy Statement.

10.2. Third parties, including advertisers with whom Fine Grade may have a relationship, may also set cookies. Such third parties are responsible for placing and using such cookies and may collect information about you through such cookies; Fine Grade does not have access to such cookies, control the use of such cookies nor control over the privacy policy of such parties. You can use "ad blockers" to your own preferences in such situations.

10.3. We may use an e-mail delivery and marketing company to send you e-mails. Pixel tags and cookies are used in those e-mail messages and at our website to help us measure the effectiveness of our advertising and how visitors use our site.

10.4. If you sign up for our newsletter, which is administered through Mailchimp we will store some of your information, including your email address, IP address and certain information about the links you click within the emails we send you, on a Mailchimp server. Neither we nor Mailchimp will ever sell your email address or share it with any other party, unless we are legally compelled to do so by a competent court or law enforcement agency order.

10.5. If you contact Mailchimp directly regarding your subscription to our newsletter, Mailchimp may contact you directly; otherwise, Mailchimp will never contact you. Only authorised Mailchimp employees have access to our subscriber list. You are always free to unsubscribe from our newsletter, but as long as you are registered with Fine Grade we may use Mailchimp to send you information about your account.

UK/EUEAA GDPR Compliance Policy Statement.

11.0. Introduction.

11.1. The EU General Data Protection Regulation (“GDPR”) comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach,

the GDPR has been designed to meet the requirements of the digital age.

11.2. The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

12.0. Our Commitment to You

We are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We believe we have always had a robust and effective data protection program in place

which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR and the UK/ EU's Data Protection legislation.

12.1. Fine Grade are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

13.0. How We are Preparing for the GDPR

13.1. We already have a consistent level of data protection and security across our organisation, however it is our aim to be fully compliant with the GDPR by 25th May 2018. Our preparation includes:

(a) Information Audit – carrying out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.

(b) Policies & Procedures – revising/implementing new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

(c) Data Protection – our main policy and procedure document for data protection has been overhauled to

meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.

(d) Data Retention & Erasure – we have updated our retention policy and schedule to ensure that we meet the ‘data minimisation’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘Right to Erasure’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.

(e) Data Breaches – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.

(f) International Data Transfers & Third-Party Disclosures – where Fine Grade stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to

assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.

(g) Subject Access Requests (SAR) – You have a right to know what information we hold on you. We have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

(h) Legal Basis for Processing – we are reviewing all processing activities to identify the legal basis for

processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.

(i) Privacy Notice/Policy – we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

(j) Obtaining Consent – we are revising our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have

developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.

(k) Direct Marketing – we are revising the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.

(l) Data Protection Impact Assessments (DPIA) – where we process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data; we have developed stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements. We have implemented documentation processes that

record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).

(m) Processor Agreements – where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting etc), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR.

(n) Special Categories Data – where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements

and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

14.0. Data Subject Rights

14.1. In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via our website of an individual's right to access any personal information that Fine Grade processes about them and to request information about: –

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

15.0. Information Security & Technical and Organisational Measures

15.1. Fine Grade takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to

protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including; SSL, access controls, password policy, encryptions, pseudonymisation, practices, restriction, IT, authentication etc.

16.0. GDPR Roles and Employees

16.1. We have designated Johnathan Voss as our Controller of Data and have appointed a data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team is responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

16.2. Fine Grade understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans. We have implemented an employee awareness program specific to the above, which will be rolled out to all employees prior to May 25th, 2018. This forms an ongoing part of our induction and annual training program.

17.0. If you have any questions about our preparation for the GDPR or our Privacy Policy, please contact Johnathan Voss who is our Controller of Data on office@finegrade.co.uk

18.0 Changes to our Privacy Policy

18.1. We reserve the right to make future changes to our Privacy Policy. If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date below.

Policy changes will apply only to information collected after the date of the change. This policy was last modified on 13th Jan 2024.

If there are any questions regarding any other aspect of our services or policies please contact us as below.

Telephone: 07708 290445

Email: office@finegrade.co.uk