

Privacy Policy

We will never sell your data!

The Privacy Policy outlined below applies to The Custom Spirit Co., a trading name of Inebriation Ltd., The Custom Spirit Co./Inebriation Ltd is registered in the United Kingdom with the company trading number 12520208.

Personal Data may be collected for the following purposes and using the following services:

1. Analytics

Google Analytics and Facebook Pixel with the IP address anonymized where possible.

Personal data: *Cookies* (see [our cookie policy](#)).

2. Contacting the User

Mailing List, Newsletter, Placing an Order or Joining the Custom Spirit Club

Personal Data: such as but not necessarily limited to full name, address, email address, phone number.

Payment information is handled by a separate service, Stripe. As such it is not held by Inebriation Ltd.

3. Displaying content from external platforms

Facebook widget; YouTube video widget and Google Maps widget, and other similar widgets.

Personal Data: *Cookies* (see *Cookies Policy* below).

4. Interaction with External Social Networks and Platforms

Facebook

Personal Data: Cookies (see Cookies Policy below); Usage Data

LinkedIn

Personal Data: Cookies (see Cookies Policy below); Usage Data

Instagram

Personal Data: Cookies (see Cookies Policy below); Usage Data

Twitter

Personal Data: Cookies (see Cookies Policy below); Usage Data

Pinterest

Personal Data: Cookies (see Cookies Policy below); Usage Data

5. Managing Contacts and Sending Messages

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Personal Data: such as but not necessarily limited to full name, address, email address, phone number. This may be stored on a custom database or handled by a provider such as Mailchimp.

6. Information for the Processing of Personal Data

Pursuant to and for the purposes of art. 13 of the EU Regulation 2016/679 (hereafter “GDPR”) concerning the protection of natural persons with regard to the processing of personal data.

The company Custom Spirit Co./Inebriation Ltd. (hereafter “The Holder”), as the data controller, informs you that the personal data acquired, with reference to the established relationships outlined herein or in other relevant documents, shall be processed in compliance with the aforementioned law.

In relation to the aforementioned treatments, the following information is also provided.

7. Data Controller

The Custom Spirit Co., THE Owner, in the person of its Directors established in 20-22 Wenlock Road, London, N1 7GU and available for contact at admin@customspirit.co.

7.1. Object of the processing.

The Owner treats personal data, identification (in particular, individual/company name, city; individual/company address incl. city and ZIP/Postal code, company registration number, VAT or TAX ID contact name (first name and last name of individual) email address; first name; last name; phone number – hereafter, “personal data” or even “data”) you have provided during the signing of this information

7.2. Purpose of the processing

Your personal data are processed:

A. without your express consent pursuant to art. 6 letters b), e) GDPR 2016/679, for the following purposes:

- to fulfil the obligations established by law, by community legislation, by a regulation or by an order of the Authority;
- Execution of the contract you have signed

7.3. Collected information

The following types of personal information may be collected, stored, and used:

- information about your computer including your IP address, geographical location, browser type and version, and operating system;

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- information about your visits to and use of this website including the referral source, length of visit, page views, and website navigation paths;
- information mentioned in this policy as of point 7.2 A.
- information, such as your name and email address, that you enter in order to set up subscriptions to our emails and/or newsletters or Club;
- information that you enter while using the services on our website;
- information that is generated while using our website, including when, how often, and under what circumstances you use it;
- information contained in any communications that you send to us by email or through our website, including its communication content and metadata;
- any other personal information that you send to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy

7.4. Modalities of the processing

The processing of your personal data is carried out by the operations indicated in the art. 4, n. 2 GDPR 2016/679 and more precisely: collection and registration, organization, conservation, consultation, cancellation and destruction of data. The processing of your data will be based on the principles of correctness, lawfulness and transparency and can also be carried out through automated procedures designed to store, manage and transmit them and will take place through appropriate tools, as far as reason and state of the art, to ensure safety and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorized access, illicit use and dissemination. Your personal data may be subjected to both paper and electronic processing.

7.5. Use of personal data

Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website. We may use your personal information for the following:

- administering our website and business;
- personalizing our website for you;
- sending statements, quotations, order confirmations, invoices, payment reminders and other business relevant documents to you,
- sending you non-marketing commercial communications;
- sending you marketing communications;
- sending you email notifications that you have specifically requested;

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- the newsletter; sending you our email newsletter, if you have requested it (you can inform us at any time if you no longer require)
- sending you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- providing third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- dealing with inquiries and complaints made by or about you relating to our website;
- verifying compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service); and other uses.

We will not, without your express consent, supply your personal information to any third party for their or any other third party's direct marketing.

7.6. Disclosing personal information

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors as reasonably necessary for the purposes set out in this policy. It shall only be shared with said parties if reasonably necessary.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

- to the extent that we are required to do so by law;
- in connection with any ongoing or prospective legal proceedings;
- in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

7.7. International data transfers

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Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.

Information that we collect may be transferred to countries which do not have data protection laws equivalent to those in force in the European Economic Area such as the United States of America.

You expressly agree to the transfers of personal information described in this Section.

7.8. Data retention

The Data Controller will process personal data for the time necessary to fulfil the aforementioned purposes and in any case for the performance of a contract. After this deadline, the data will be deleted, destroyed or made anonymous.

Notwithstanding the above, we will retain documents (including electronic documents) containing personal data to the extent that we are required to do so by law:

- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- in order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

7.9. Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

7.10. Rights of the interested party

As an interested party, You are the owner of the rights referred to in art. 15 and ss. of the GDPR 2016/679 and precisely the right:

- to request the data controller, to have access to personal data (article 15), i.e. confirmation of whether or not the processing of your personal data is being processed and, in this case, have access to the data;
- to demand, to the data controller, a correction (article 16), that is to obtain the correction and / or integration of the incorrect personal data concerning you;
- to ask the data controller to delete them (art. 17) or to obtain the cancellation of data concerning them without undue delay;
- to ask the data controller to limit the processing that concerns it (Article 18), i.e. to obtain a confirmation that the processing of your personal data is limited to what is necessary for the storage purpose;
- to have the data portability (article 20) that is to obtain, in a structured common and legible format, your personal data;

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- to object to their processing (article 21) or, at any time, to oppose, for any reason connected with your particular situation, the processing of your data;
- rights concerning the automated decision-making processes (article 22), i.e. the right not to be subjected to a decision based uniquely on automated data processing without your explicit consent.
- to cancel (Article 17), i.e. the right to obtain, in the cases provided for by the Regulations, the cancellation of Your personal data; Furthermore, at any time, you may revoke the consent on which the treatment carried out is based, on the achievement of the consent to the processing;
- to lodge a complaint with the Supervisory Authority (Article 77), i.e. the right to appeal to the Authority in the event that it considers that the treatment concerning you is infringing the Regulation;

7.11. Data breach and notification to the Privacy Guarantor and / or communication of the violation to the interested party

In case of violation of personal data – to be understood as a breach of security that involves accidentally or in an unlawful manner the destruction, loss, modification, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed – in which the risk for the rights and freedoms of persons is to be considered probable and / or high, the Data Controller will notify the Privacy Guarantor without delay and in any case no later than 72 hours, giving a description of the nature of the data breach, including the number of data subjects and the categories of data concerned.

12. Procedure for the exercise of any right

You may exercise, at any time, the above rights by sending:

- a registered letter to: Inebriation Ltd. 20-22 Wenlock Road, London, N1 7GU
- an e-mail to: admin@customspirit.co