Privacy Policy

Version 1.0

Policy Name: Privacy Policy

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Effective Date: 10/03/2026

Approved by: Board of Directors, Penny Apples Limited Next Review: 10/03/2027

If you have any queries on this policy, please contact info@pennyapples.com

Policy Statement

This privacy policy applies between you, the user of this website and Penny Apples Limited, the owner and provider of this website. Penny Apples Limited takes the privacy of your information very seriously. This privacy policy applies to our use of any and all data collected by us or provided by you in relation to your use of the website.

Definitions and Interpretation

1. In this privacy policy, the following definitions are used:

Data

Collectively all information that you submit to Penny Apples Limited via the website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.

Cookies

A small text file placed on your computer by this website when you visit certain parts of the website and / or when you use certain features of the website. Details of the cookies used by this website are set out in the clause below (Cookies).

Data Protection Laws

Any applicable law relating to the processing of personal data, including but not limited to the GDPR, the Data Protection Acts 1988 to 2018 and any other national implementing laws, regulations and secondary legislation in Ireland.

GDPR

The General Data Protection Regulation (EU) 2016/679.

Penny Apples Limited, we or us

Penny Apples Limited, a company registered in Ireland (company number 619722), whose registered office is at 22 Northumberland Road, Ballsbridge, Dublin 4, D04 ED73.

Irish and EU Cookie Law

The European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (S.I. No. 336 of 2011), which implement the EU ePrivacy Directive (2002/58/EC) in Ireland.

User or you

Any third-party that accesses the Website and is not either (i) employed by Penny Apples Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Penny Apples Limited and accessing the website in connection with the provision of such services.

Irish and EU Cookie Law

The European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (S.I. No. 336 of 2011), which implement the EU ePrivacy Directive (2002/58/EC) in Ireland.

Website

The website that you are currently using, www.pennyapples.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa;
- references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- “including” is understood to mean “including without limitation”;
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this privacy policy.

Scope of This Privacy Policy

3. This privacy policy applies only to the actions of Penny Apples Limited and users with

respect to this website. It does not extend to any websites that can be accessed from this website including, but not limited to, any links we may provide to social media websites.

4. For purposes of the applicable Data Protection Laws, Penny Apples Limited is the

“data controller” . This means that Penny Apples Limited determines the purposes for which, and the manner in which, your data is processed.

Data Collected

5. We may collect the following data, which includes personal data, from you:

- demographic information such as Eircode or postcode, preferences and interests;
- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected);
- a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected); in each case, in accordance with this privacy policy.

How we Collect Data

6. We collect data in the following ways:

- data is given to use by you;
- data is received from other sources; and
- data is collected automatically

Data Given to Us by You

7. Penny Apples Limited will collect your data in a number of ways, for example:

- when you contact us through the website, by telephone, post, email or through any other means;
- when you elect to receive marketing communications from us;
- when you use our services; in each case, in accordance with this privacy policy.

Data That is Received from Third Parties

8. Penny Apples Limited will receive data about you from the following third parties:

- Google.

Data That is Received by Publicly Available Third-Party Sources

9. We will receive data about you from the following publicly available third-party sources:

- Google.

Data That is Collected Automatically

10. To the extent that you access the website, we will collect your data automatically, for

example:

- we automatically collect some information about your visit to the website. This information helps us make improvements to the website content and navigation, and includes your IP address, the date, times and frequency with which you access the website and the way you use and interact with its content.
- we will collect your data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the website, see the section below, headed “cookies”.

Our Use of Data

11. Any or all of the above data may be required by us from time to time in order to provide

you with the best service and experience when using our website. Specifically, data may be used by use for the following reasons:

- internal record keeping;
- improvement of our products / services;
- transmission by email of marketing materials that may be of interest to you;
- connect for market research purposed which may be done using email, telephone, fax or mail. Such information may be used to customise or update the website; in each case, in accordance with this privacy policy.

12. We may use your data for the above purposes if we deem it necessary to do so for our

legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed “Your rights” below).

13. For the delivery of direct marketing to you via email, we’ll need your consent, whether

via an opt-in or soft-opt-in:

- soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under “soft opt-in” consent, we will take your consent as given unless you opt-out.
- for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we’ll provide.
- if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed “Your rights” below.

Who we Share Data With

14. We may share your data with the following groups of people for the following reasons:

- our employees, agents and/or professional advisors – to provide services or information as requested;
- relevant authorities – to facilitate the detection of crime or the collection of taxes or duties; in each case, in accordance with this privacy policy.

Keeping Data Secure

15. We will use technical and organisational measures to safeguard your data, for example:

- access to your account is controlled by a password and a username that is unique to you.
- we store your data on secure servers.

16. Technical and organisational measures include measures to deal with any suspected

data breach. If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us via this email address: info@pennyapples.com.

17. If you want detailed information on how to protect your

information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit the website of Ireland's National Cyber Security Centre at www.ncsc.gov.ie.

Data Retention

18. Unless a longer retention period is required or permitted by law, we will only hold your

data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the data be deleted.

19. Even if we delete your data, it may persist on backup or archival media for legal, tax or

regulatory purposes.

Your Rights

20. You have the following rights in relation to your data:

- Right to access– the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive. " Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- Right to correct– the right to have your data rectified if it is inaccurate or incomplete.
- Right to erase– the right to request that we delete or remove your data from our systems.
- Right to restrict our use of your data– the right to "block" us from using your data or limit the way in which we can use it.
- Right to data portability– the right to request that we move, copy or transfer your data.
- Right to object– the right to object to our use of your data including where we use it for our legitimate interests.

21. To make enquiries, exercise any of your rights set out above, or withdraw your consent to

the processing of your data (where consent is our legal basis for processing your data), please contact us via this email address: info@pennyapples.com.

22. If you are not satisfied with the way a complaint you make in relation to your data is

handled by us, you may be able to refer your complaint to the relevant data protection authority. In Ireland, this is the Data Protection Commission (DPC). The DPC's contact details can be found on their website at https://www.dataprotection.ie/.

23. It is important that the data we hold about you is accurate and current. Please keep us

informed if your data changes during the period for which we hold it.

Links to Other Websites

24. This website may, from time to time, provide links to other websites. We have no control

over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of Business Ownership and Control

25. Penny Apples Limited may, from time to time, expand or reduce our business and this

may involve the sale and/or the transfer of control of all or part of Penny Apples Limited. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the data for the purposes for which it was originally supplied to us.

26. We may also disclose data to a prospective purchaser of our business or any part of it.

27. In the above instances, we will take steps with the aim of ensuring your privacy is

protected.

Cookies

28. This website may place and access certain Cookies on your computer. Penny Apples Limited uses Cookies to improve your experience of using the website. Penny Apples Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

29. All Cookies used by this website are used in accordance with current Irish and EU Cookie

Law.

30. Before the website places Cookies on your computer, you will be presented with a

message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Penny Apples Limited to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the website may not function fully or as intended.

31. This website may place the following Cookies:

Type of cookie Purpose Strictly necessary cookies These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. Analytical / performance cookies They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. Functionality cookies They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

32. You can find a list of Cookies that we use in the Cookies Schedule.

33. You can choose to enable or disable Cookies in your internet browser. By default, most

internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

34. You can choose to delete Cookies at any time; however you may lose any information

that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

35. It is recommended that you ensure that your internet browser is up-to-date and that you

consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

36. For more information generally on cookies, including how to disable them, please refer

to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General

37. You may not transfer any of your rights under this privacy policy to any other person. We

may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

38. If any court or competent authority finds that any provision of this privacy policy (or part

of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

39. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or

remedy will be deemed a waiver of that, or any other, right or remedy.

40. This Agreement will be governed by and interpreted according to the law of

Ireland. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Irish courts.

Changes to This Privacy Policy

41. Penny Apples Limited reserves the right to change this privacy policy as we may deem

necessary from time to time or as may be required by law. Any changes will be immediately posted on the website, and you are deemed to have accepted the terms of the privacy policy on your first use of the website following the alterations. You may contact Penny Apples Limited by email at info@pennyapples.com.

Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary We use the following strictly necessary cookies:

Description of cookie Purpose Session cookie We use this session cookie to remember you and maintain your session whilst you are using our website.

Analytical / performance We use the following analytical / performance cookies:

Description of cookie Purpose Google analytics We use this cookie to help us analyse how users use the website.

Functionality We use the following functionality cookies:

Description of cookie Purpose Google analytics We use this cookie to identify your computer and analyse traffic patterns on our website.