

DATA USAGE POLICY: UK VINEYARD GUIDE

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1. DATA CONTROLLER AND GOVERNANCE

1.1 This Data Usage Policy ("Policy") details the technical processing, storage, and transmission of data by UK Vineyard Guide ("we", "us").

1.2 This Policy is designed to provide transparency regarding the lifecycle of user data in compliance with the **UK Data Protection Act 2018** and **UK GDPR**.

1.3 The designated Data Controller can be contacted at: ashley@ukvineyardguide.co.uk.

2. DATA TYPES AND COLLECTION SOURCES

2.1 Information Provided by User: * **2.1.1 Account Identifiers:** Email address and hashed passwords required for secure authentication.

- **2.1.2 Profile Metadata:** Voluntary submission of name, telephone number, and profile imagery.
- **2.1.3 User Content:** Itineraries, vineyard notes, reviews, and images uploaded to the platform. **2.2 Automated Technical Collection:** * **2.2.1 Device Identifiers:** Unique mobile device IDs and IP addresses used for session management and threat prevention.
- **2.2.2 Environment Data:** Device hardware model and operating system version for app optimization. **2.3 Integrated Service Data:** * **2.3.1 Transactional Data:** Booking details (excluding financial card data) facilitated through our partnership with **Ticket Tailor**.

3. FUNCTIONAL PURPOSES OF DATA USAGE

3.1 Core Service Operation: We use collected data to provide the primary features of the App, including synchronizing trip plans across devices and managing user accounts.

3.2 AI Sommelier Processing: Queries and text inputs provided to the AI Sommelier are processed to generate personalized wine and vineyard recommendations.

3.3 Security and Integrity: Technical logs and IP data are used to detect unauthorized access, prevent DDoS attacks, and ensure platform stability.

3.4 Communication: Email addresses are used strictly for transactional purposes, including account verification and security alerts.

4. DATA TRANSMISSION AND THIRD-PARTY DISCLOSURES

4.1 Service Processors: We transmit data to specific third-party sub-processors solely for functional necessity:

- **4.1.1 Infrastructure:** Data is hosted and stored on **Amazon Web Services (AWS)**.
 - **4.1.2 Payments:** Payment tokens are handled by **Stripe**. We do not ingest or store raw credit card data.
 - **4.1.3 Transactional Messaging:** Email delivery is managed via **Mailchimp Transactional**.
- 4.2 Prohibited Disclosures:** We do not engage in the sale of user data, nor do we disclose data to third-party advertisers or brokers for cross-app tracking.

5. DATA SECURITY AND PROTECTION STANDARDS

5.1 Encryption Protocol: All data is protected via **TLS 1.2 or higher** during transit.

5.2 Storage Security: Data at rest is secured using **AES-256 encryption** within the AWS environment.

5.3 International Transfers: Any data transferred outside the UK/EEA is governed by **Standard Contractual Clauses (SCCs)** to ensure an equivalent level of protection.

6. DATA RETENTION AND DISPOSAL

6.1 Retention Schedule: Personal data is retained for the duration of the user's active account status.

6.2 Deletion Protocol: Upon a request for account termination, all associated personal data and user-generated content are purged from our production databases within 30 days.

6.3 Backup Persistence: Encrypted backups may retain data for a maximum of 90 days following deletion before being overwritten.

7. USER RIGHTS AND ACCESS

7.1 Rights of the Data Subject: Users maintain the right to access, rectify, or request the erasure of their data.

7.2 Exercise of Rights: To request a copy of stored data or initiate account deletion, contact ashley@ukvineyardguide.co.uk.