

PRIVACY NOTICE

GDPR makes it clear that businesses should ensure that information given to or collected is done in a concise, transparent and easily accessible format, using plain language.

Businesses must provide information detailing how personal data will be processed.

The privacy notice applies only to customers (online, retail and catering).

1. **GDPR PRIVACY NOTICE FOR CUSTOMERS: *ONLINE, RETAIL and CATERING.***

- 1.1. Brendan Anderton Butchers Ltd (The “Company”) is committed to protecting the privacy and security of your personal information.
- 1.2. The purpose of this policy is to outline how we collect and use personal information about you in accordance with the General Data Protection Policy.
- 1.3. This policy applies to all customers: online, retail and catering.
- 1.4. The Company is a “data controller”. This means that the Company is responsible for deciding how we hold and use personal information about you. The Company is required under the data protection legislation to notify you of the information contained within this privacy notice policy.
- 1.5. This notice applies to current and former customers. The Company reserves the right to update this notice at any time.
- 1.6. You should read this policy/notice, together with any other privacy notice which the Company may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why the Company are using such information.

1.7. What are the principles of Data Protection?

1.7.1. The Company will at all times comply with data protection law. The law states that any personal information that the Company holds about you must be:

- 1.7.1.1. Used lawfully, fairly and in a transparent way;
- 1.7.1.2. Collected only for valid purposes that the Company has clearly explained to you and not used in any way that is incompatible with those purposes;
- 1.7.1.3. Relevant to the purposes that the Company has told you about and limited to those purposes only;
- 1.7.1.4. Accurate and kept up to date;
- 1.7.1.5. Kept only for as long as necessary for the purposes that the Company has told you about. And;
- 1.7.1.6. Kept securely.

1.8. What type of information does the Company hold about me?

1.8.1. The Company will hold personal data, or personal information about you, which means any information which could identify you. This does not include data where your identity has been removed (anonymous data).

1.8.2. The Company will collect, store, and use the following categories of personal data about you, including but not limited to:

- 1.8.2.1. Personal details such as your name, title, addresses, telephone numbers and personal email addresses;
- 1.8.2.2. Gender;
- 1.8.2.3. Historic orders for market analysis, reference and marketing purposes.
- 1.8.2.4. CCTV footage;
- 1.8.2.5. Information about your use of the Company's information supplied through the website, social media and mail chimp
- 1.8.2.6.

1.9. How will my personal information be collected?

1.9.1. The Company will typically collect personal information about customers through the ordering and supply process, either direct from customer, or sometimes from a person appointed by the customer to act on their behalf.

1.10. How will the Company use information about me?

- 1.10.1. The Company will only use your personal information when the law allows it to do so.
- 1.10.2. The Company will most commonly use your personal information in the following circumstances:
 - 1.10.2.1. Where the Company needs to perform the contract which it has entered in to with you;
 - 1.10.2.2. Where the Company needs to comply with a legal obligation and
 - 1.10.2.3. Where it is necessary for the Company's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
 - 1.10.2.4. For market analysis, reference and advertising.
- 1.10.3. The Company may also use your personal information in the following situations, which are likely to be rare:
- 1.10.4. Where it is needed in the public interest or for official purposes.

1.11. In what situations will the company use my personal information?

- 1.11.1. The Company needs all of the categories of information listed above at clause 1.8, primarily to allow the Company to perform its contract with you and to enable the Company to comply with its legal obligations.
- 1.11.2. The Company may in some cases use your personal information to pursue legitimate interests of its own (advertising).
- 1.11.3. provided that your interests and fundamental rights do not override those interests.
- 1.11.4. The situations in which the Company will process your personal information are when the Company is:
 - 1.11.4.1. Making a decision about your supply;
 - 1.11.4.2. Determining the terms on which you are supplied;
 - 1.11.4.3. Receiving payments from you;
 - 1.11.4.4. Administering the contract which the Company have entered in to with you;
 - 1.11.4.5. Business management and planning, including accounting and auditing;
 - 1.11.4.6. Ensuring compliance with Company policies and procedures;
 - 1.11.4.7. Conducting reviews / analysis of sale, managing performance and determining performance requirements;
 - 1.11.4.8. Making decisions about your continued supply;
 - 1.11.4.9. Education, training and development requirements;

1.11.4.10. Complying with legal obligations;

1.11.4.11. To conduct data analytics studies to review and better understand customer retention;

1.11.5. Some of the above grounds for processing will overlap and there may be several grounds which justifies the use of your personal information.

1.12. What happens if I fail to provide personal information?

1.12.1. If you fail to provide certain information when requested, the Company may not be able to perform the contract it entered in to with you, or the Company may be prevented from complying with its legal obligations.

1.13. Can the Company change the purpose for which it is using my personal data?

1.13.1. The Company will only use your personal information for the purposes for which it collected it, unless it reasonably considers it needs to use it for another reason, and that the reason is compatible with the original purpose.

1.13.2. If the Company needs to use your personal information for an unrelated purpose, the Company will notify you and explain the legal basis for this.

1.13.3. The Company may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1.14. What is data sharing and how will this affect me?

1.14.1. The Company may have to share your data with third parties, including third-party service providers and other entities in the Company's group.

1.14.2. The Company may require third parties to respect the security of your data and to treat it in accordance with the law.

1.14.3. The Company may transfer your personal information outside the EU; if we do we would expect you to receive a similar degree of protection in respect of your personal information.

1.15. Why might you share my personal information with third parties?

1.15.1. The Company may share personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where it has another legitimate interest in doing so, for example, storing data on server, contact via Mail Chimp (advertising).

1.16. Which third-party service providers process my personal information?

1.16.1. "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within the Company's group

1.17. How secure is my information with third-party service providers and other entities in our group?

1.17.1. All of the Company's third-party service providers are required to take appropriate security measures to protect your personal information in line with Company policies. The Company does not allow its third-party service providers to use your personal data for their own purposes. The Company only permits them to process your personal data for specified purposes and in accordance with our instructions.

1.17.2. To ensure the Company's third party service providers are complying with their obligations under data protection regulations and safeguarding your personal data, the Company may conduct audits on third party service providers from time to time as well as seeking contractual commitment for compliance with data protection obligations.

1.18. When might you share my personal information with other entities in the Group?

1.18.1. The Company will share your personal information with other entities in our Group as part of its regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

1.19. What about other third parties?

1.19.1. The Company may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

1.20. Will my information be transferred outside of the EU?

1.20.1. We may transfer the personal information we collect about you to the following country outside the EU – America. There is an adequacy decision by the European Commission in respect of that country. This means that the country to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

1.20.2. To ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure[s] to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection: Symantec Endpoint Security. If you require further information about protective measures, you can request it from Emma Medhurst.

1.21. What is data security and how does this affect me?

- 1.21.1. The Company has put in place measures to protect the security of your information. Details of these measures are available upon request.
- 1.21.2. Third parties will only be entitled to process your personal information on the Company's instructions and where we have agreed to treat the information confidentially and to keep it secure.
- 1.21.3. The Company has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 1.21.4. The Company has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where it is legally required to do so.

1.22. How long will you use my information for?

- 1.22.1. The Company will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 1.22.2. To determine the appropriate retention period for personal data, the Company considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 1.22.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

1.23. Do I have a duty to inform the Company of changes

- 1.23.1. Yes, it is important that the personal information the Company holds about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

1.24. What rights do I have in connection to my personal information?

1.24.1. Under certain circumstances, by law you have the right to:

1.24.1.1. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

1.24.1.2. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

1.24.1.3. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)

1.24.1.4. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

1.24.1.5. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

1.24.1.6. **Request the transfer** of your personal information to another party.

1.24.2. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that the Company transfers a copy of your personal information to another party, please contact Emma Medhurst in writing.

1.25. Are fees usually required?

1.25.1. Not usually, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, the Company may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

1.26. Will the Company require anything from me?

- 1.26.1. The Company may need to request specific information from you to help it confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive.

1.27. Am I able to withdraw my consent?

- 1.27.1. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Emma Medhurst. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

1.28. Can this policy be amended?

- 1.28.1. Yes, the Company reserves the right to update this privacy notice at any time, and it will provide you with a new privacy notice when it makes any substantial updates. The Company may also notify you in other ways from time to time about the processing of your personal information
- 1.28.2. If you have any questions about this privacy notice, please contact **Emma Medhurst – 07976608580 – emma@brendanandertonbutchers.co.uk**.