# **Privacy Policy**



We are Nature's Finest Food Products Ltd ("we", "us" or "our"). We supply high quality, responsibly sourced ambient food products supplied to leading retailers and food service customers globally.

Full contact details can be found here: <a href="https://naturesfinestfoods.co.uk/lets-talk/">https://naturesfinestfoods.co.uk/lets-talk/</a>

We are the controller and responsible for your personal data. In compliance with the UK data protection law, our Privacy Policy provides information on how and why we collect your personal information, what we do with it, and how we keep your information secure. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this Privacy Policy. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

# INFORMATION WE MAY COLLECT FROM YOU

We may collect and process different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, any previous names, title, and gender.
- Contact Data includes postal address, email address and telephone numbers.
- Financial Data includes bank account details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes feedback and survey responses.
- Usage Data includes information about how you interact with and use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

#### HOW DO WE COLLECT YOUR PERSONAL DATA?

# How is your personal data collected?

We use different methods to collect data from and about you including through:

Your interactions with us. You may give us your personal data by filling in online forms (such as the contact form on the website), connecting with us via our pages on Facebook or Instagram, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- subscribe to our newsletter;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [https://naturesfinestfoods.co.uk/cookie-policy/for further details.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below: Technical Data is collected from analytics providers such as Google based outside the UK.

#### WHAT WE DO WITH THE INFORMATION WE GATHER?

# Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

**Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.

**Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

**Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to our email newsletter.

# Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Profile</li><li>(d) Marketing and</li><li>Communications</li><li>(e) Financial Data</li></ul>	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) (c) necessary to deal with any complaints and issue compensation where appropriate
To enable you to partake in a prize draw, competition or complete a survey	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Profile</li><li>(d) Usage</li><li>(e) Marketing and Communications</li></ul>	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to

system maintenance, support, reporting and hosting of data)		prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Profile</li><li>(d) Usage</li><li>(e) Marketing and Communications</li><li>(f) Technical</li></ul>	Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Technical</li><li>(d) Usage</li><li>(e) Profile</li><li>(f) Marketing and</li><li>Communications</li></ul>	Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products and to help us

improve and develop our and services).
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## **Direct marketing**

When you subscribe to our newsletter or enter a competition or promotion that we are running, when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us via email.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

## Third-party marketing

We will not share your personal data with any third party for their own direct marketing purposes.

## Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us hello@naturesfinestfoods.co.uk

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to updates to this privacy policy, checking that your contact details are correct.

# HOW WE USE COOKIES

For more information about the cookies we use and how to change your cookie preferences, please see <a href="https://naturesfinestfoods.co.uk/cookie-policy/">https://naturesfinestfoods.co.uk/cookie-policy/</a>

# DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table "Purposes for which we will use your personal data" above:

Our parent company World Wise Foods Limited for administration purposes;

Active Campaign which provides us with marketing software; and

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### International transfers

We do not transfer your personal data outside the UK.

### DATA RETENTION

# How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider 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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see "Your legal rights" below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

# Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see OPTING OUT OF MARKETING above for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us at <a href="https://example.co.uk.">hello@naturesfinestfoods.co.uk</a>.

# No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

# Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## LINKS TO OTHER WEBSITES

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

#### WHERE WE STORE OUR PERSONAL DATA

The data that we collect from you may be processed by staff operating in the UK who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your contract, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

All information you provide to us is stored on secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# CHANGES TO OUR PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## YOUR RIGHT TO COMPLAIN

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Email address: hello@naturesfinestfoods.co.uk

Postal address: 5 Queens Square

Ascot Business Park Lyndhurst Road Ascot

SL5 9FE

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