

PRIVACY NOTICE – CUSTOMERS & SUPPLIERS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our Customers & Suppliers, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to potential, current and prior Customers & Suppliers.

A) Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) Types Of Data Held

We keep minimal levels of personal data relating to the contact person(s) at our Customers & Suppliers in order for the business relationship to be carried out effectively and efficiently. We keep this data in a file relating to each customer or supplier and we also hold the data within our computer systems.

Specifically, we hold the following types of personal data in relation to the contact person:

- a) name
- b) email address
- c) telephone numbers



- d) job title
- e) CCTV footage (if visiting our sites)
- f) building access card records (if visiting our sites)
- g) payment address information (limited to small amount of credit card paying customers)

C) Collecting Your Data

You provide several pieces of data to us directly during the selection and engagement process and subsequently upon the start of business supply.

Personal data is kept in files or within the Company's IT systems.

D) Lawful Basis For Processing

The law on data protection allows us to process your data for certain reasons only. We process your data in order to comply with a legal requirement if there is a formal supply contract between our businesses or in our legitimate interests if there is a general business relationship.

This includes collecting initial contact details in order to first establish a relationship and then extending those contact details as the relationship grows to include all relevant functions within the business.

E) Special Categories Of Data

Special categories of data are (for example) data relating to your health, gender, race, ethnic origin, political opinion, genetic & biometrics and criminal convictions.

We do not carry out any processing activities with regard to the above categories as part of the business relationship with our Customers & Suppliers

F) Failure To Provide Data

Your failure to provide us with data may mean that we are unable to perform our contractual commitments in relation to you or efficiently carry on business relationship.



G) Who We Share Your Data With

We may share your data with third parties mainly in order to perform our contractual commitments in relation to you, or for other reasons to comply with a legal obligation placed upon us. In the event of a Company sale or acquisition we may also share your data with related parties. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We would not expect to share your data with bodies outside of the European Economic Area. In the event that this may happen we would ensure relevant compliance is achieved.

H) Protecting Your Data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) Retention Periods

We only keep your data for as long as is necessary to perform our contractual commitments in relation to you and for as long as is required according to statutory retention periods.

J) Automated Decision Making

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

K) Data Subject Rights

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";



- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

L) Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data. At this time we do not process any personal data that relies upon consent only.

M) Making A Complaint

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or telephone on 0303 123 1113 (local rate) or 01625 545 745.

N) Data Protection Compliance

Our appointed compliance officer in respect of our data protection activities is: Craig Liggins (UK CFO)

You can make contact via Email: craig.liggins@puredrive.co.uk or Telephone: 01536 463000 or Letter: Zwanenberg Foods UK Ltd, 36A Causeway Road, Earlstrees Industrial Estate, Corby, NN17 4DU.