



Baxters Food Group

Website Privacy Policy

1 Introduction

We take privacy and the protection of personal information seriously. We are Baxters Food Group Limited ("Baxters", "we" or "us") and we are a "controller" of the personal information we use in conducting our business for the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, any personal data that you make available to us.

We take your privacy very seriously and we ask that you read this policy carefully as it contains important information on:

- the personal information we collect about you;
- what we do with your information;
- who your information might be shared with; and
- your privacy rights.

2 How we use personal information

We use a variety of personal information depending on the circumstances under which personal information is made available to us.

We will ask you to provide certain personal information when you buy a product on our website, sign up for our newsletter, enter one of our competitions, complete one of our customer feedback cards, if you contact us to make an enquiry or a complaint, if you apply for a job with us, or where you are one of our business contacts. Without your personal information, we will not be able to fulfil your request to us in any of these circumstances.

We will only use the personal information which you provide to us, or which we collect using cookies on our website. We will not gather or obtain personal information from third party sources.

We collect and use personal information in the following circumstances:

- **Customer orders:** When you make an order for products with us, we gather certain personal information such as your name, delivery and billing address, email address, telephone number, your payment information (such as your debit or credit card details) and any further information that may be needed to fulfil your order (such as special delivery instructions). We require this information to perform our contract with you to provide you with the goods you have ordered from us.

- **Competitions:** When you enter one of our competitions or prize draws, we will collect your name and your contact details, and any information provided as part of your competition or prize draw entry. We use this information to administer the contest and to contact you if you are the winner. It is in our legitimate interests to run competitions and prize draws to engage with people who are interested in our products and for the promotion of our products.
- **Feedback and Engagement:** If you complete one of our feedback cards, we will collect your name and contact details and information contained in your feedback (which will include your opinions about our products and customer services). It is in our legitimate interests to gather this feedback to help us identify improvements in our products and services, and also to recognise and reward excellence.
- **Enquiries:** If you get in touch with us to make an enquiry or complaint, we will gather personal information about you such as your name, contacts details and information about the nature of your enquiry or complaint. This is to enable us to process and resolve your enquiry or complaint. This processing may be required for us to enter into a contract with you, and it is also in our legitimate interests to ensure we appropriately resolve all customer complaints and enquiries.
- **Reservations:** When you contact us to make a reservation at our restaurant, we will contact your name and contact details in order to process the reservations that you have asked us to place. This processing is required for our legitimate interests of processing reservations.
- **Newsletters:** Where you have signed up to one or our newsletters via the website, or where you have otherwise given us your consent to send you a newsletters or other promotional or marketing material (including emails about events we are running or sponsoring, and special promotional offers), we will use your name and email address to send such communications to you. Further information about our marketing practices is set out in paragraph 7 below.
- **Business Contacts:** We hold the names, job titles, employer details and professional contact details for various business contacts, including corporate client contacts and supplier contacts. We use this personal information as necessary for the day-to-day operation of our business and as required to meet this legitimate interest.
- **CCTV:** CCTV cameras are installed at our premises, including our store and restaurant at our Fochabers site. When you visit our premises, your image may be captured using these systems, which will reveal your location at a particular place and time. Images captured using our CCTV system may be processed for the prevention and detection of crime, and also in our legitimate interests to ensure the security of our premises and to protect our staff and property.
- **Job Applicants:** Where you apply for a role with us, we will process the personal information you provide to us as part of your application and any interview selection process. This will ordinarily include your name, personal contact details, professional history, education and qualifications and references. We may also collect and use some special categories of personal data about job applicants, such as information about an applicant's racial or ethnic origin and some health information regarding any medical conditions or disabilities. We collect this information as required to process your application, to help us meet certain legal obligations that apply to job application processes, and as required for our legitimate interests of checking that a candidate is suitable for a particular role with us.

3 How long we keep personal information

Generally we retain customer information for 2 years, and we keep unsuccessful job applications for up to 6 months after the relevant position has been filled. CCTV footage is held for up to 20 days.

We may keep your information for a longer period where required by law, or for the exercise or defence of a legal claim.

Please contact us if you would like more detailed information about how long we keep your personal information.

4 Sharing personal information

Where necessary to fulfil our obligations to you, or where it is in our legitimate interests to do so, we may pass your details to third parties. These third parties include:

- **Baxters Group:** Your information may be shared with other entities in the Baxters Group if, for example, the query you have submitted applies specifically to a different entity in the Baxters Group.
- **E-commerce suppliers:** We use various suppliers to help us fulfil customer orders (e.g. for packing and distribution, and delivery).
- **IT and marketing suppliers:** We engage IT suppliers who provide us with services which may involve the storage or transmission of your personal information. We also engage marketing suppliers (such as digital agencies) who assist us with maintaining our contact databases and sending out marketing and promotional communications.
- **Cloud:** All of your personal information will be stored in a secure central database in the “cloud” (on virtual servers) and transmitted securely across networks. This information will be accessible only to those who are authorised to view it.
- **Google Analytics:** We work with Google Analytics to automatically collect information including: IP address; MAC (Media Access Control) address; unique identifier or other persistent or non-persistent device identifier; device software platform and firmware, mobile phone carrier and geo location data to help us understand your use of our website such as how often you return, what parts of the website you visit, how you use the website and how long you spend on the website. This third party provider is prohibited from using our data for any other purposes. Go to <http://www.google.com/analytics/terms/us.html> to read the Google Analytics Privacy Policy.

We may share your personal information with these third parties for these purposes. We take steps to ensure that these third parties handle any personal information provided to them appropriately.

We may also share your personal information with third parties in the event that:

- our business or substantially all of its assets are acquired by a third party;
- if we are under a duty to disclose or share your personal information;
- in order to comply with any legal or regulatory obligation;
- in order to enforce or apply any contract with you; or
- to protect our rights, property, the safety of our employees, customers or others.

5 Our approach to information security

To protect your information, we have policies and procedures in place to make sure that only authorized personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have the necessary security measures in place.

In addition to these operational measures, we also use a range of technologies and security systems. To make sure that these measures are suitable, vulnerability tests are run regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled. Additionally, all areas of the organisation are monitored and measured to identify problems and issues before they arise.

6 International transfers

We may transfer your personal information outside the European Economic Area (**EEA**) to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the EEA. For example, we are part of an international corporate group, and where we share personal information with other members of our corporate group, this may involve sending information outside of the EEA (for example, to the US, Canada and/or Australia).

We will only transfer your personal information outside the EEA where either:

- the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or
- we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses.

If you would like more information about any international transfers of your personal data, please contact us at the details below.

7 Marketing

We may periodically send promotional emails and newsletters about new products, special offers, competitions and prize draws, events we are running, and any other information which we think you may find interesting using the email address which you have provided to us.

We will only send you marketing messages when you have signed up to receive emails from us via the contact form on our website, or whether we have gathered your personal information via another route (such as via an order or a customer feedback card) and we have obtained your consent to send you marketing.

If you change your mind about receiving our emails, you can unsubscribe at any time by contacting us at the details below, or clicking the "unsubscribe" option in any email.

8 Cookies and Tracking

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We use cookies on our website to:

- recognise you whenever you visit our website (this speeds up your access to the website as you do not have to log in each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content; and
- make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this website cookie policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

We use the following categories of cookies on our website:

- **Strictly necessary:** These cookies are essential for certain features of our websites to work (for example, making payments online). These cookies do not record personally identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services on our website cannot be provided and certain parts of our website cannot be accessed.
- **Performance:** These cookies are used to collect anonymous information about how you use our website. This information is used to help us improve our website and understand how effective our website is. In some cases we use trusted third parties to collect this information for us but they only use the information for the purposes explained.
- **Functionality:** These cookies are used to provide services or remember settings to enhance your visit, for example by remembering your text size preferences. The information these cookies collect is anonymous and does not enable us to track your browsing activity on other websites.
- **Targeting and Advertising:** These cookies are used by trusted third parties to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. Information contained in these cookies is anonymous and does not contain personal information. To find out more about cookies used for targeting and advertising follow www.youronlinechoices.com and www.networkadvertising.org or contact us for further information about the trusted third parties we use.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of our website. For further information about cookies and how to disable them please go to the ICO's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

9 Your privacy rights

Data protection laws give you a number of rights as set out below. If you would like to exercise any of your rights, please contact us in writing at the details below.

- **Access:** you may request access to a copy of your personal information.

- **Withdraw Consent:** where our processing of your personal information is based on your consent, you can withdraw your consent at any time.
- **Rectification:** you may ask us to rectify any inaccurate information we hold about you.
- **Erasure:** you may ask us to delete the personal information we hold about you, where there is no reason for us to continue to hold your information.
- **Portability:** you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or you can ask us to send your information in this format to another controller.
- **Object:** you may object to our processing of your personal information.
- **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

If you are not happy with the way in which we process your personal information, or the way in which we handle any request by you to exercise your privacy rights, you may make a complaint to the ICO by visiting their website at <https://ico.org.uk/concerns/> or on 0303 123 1113.

10 Contact details

If you have any queries about this Policy, need further information or wish to lodge a complaint you can use the details below to contact us:

Post:	FAO The Legal Department Baxters Food Group 12 Charlotte Square Edinburgh EH2 4DJ
Email:	info@baxters.co.uk Please mark for the attention of The Legal Department
Phone:	0131 526 4600

11 Changes to this Privacy Policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that applies.