

# Privacy Policy

This privacy policy sets out the data processing practices of Heritage Fine Food Company Ltd and the following trading names/product/service websites: Heritage Drive Thru, Heritage at Home, 5adaybox.

Our UK registered office is at Lowerfields Farm, Coate, Devizes, SN10 3LQ

Please note that all data captured will be used and held in accordance with the requirements of the Data Protection Act 2018 (DPA) and the EU General Data Protection Regulation (GDPR). This notice explains:

- What Heritage Fine Foods Ltd does.
- How to contact Heritage about our use of your personal data.
- Why Heritage processes personal data and the legal basis for it.
- How Heritage uses personal data for marketing purposes.
- Recipients of personal data for processing on Heritage's behalf.
- Heritage's data retention periods.
- Your rights as a data subject.
- Cookie policy and use (please see separate cookies policy).
- Third party websites.
- The security of the personal data that Heritage holds.
- Changes to our policy and practice.

## What Heritage does

The Heritage Fine Food Company are a BRC certified fruit and vegetable wholesaler based in the heart of Wiltshire.

We currently have three strands to the company, we supply to the catering trade, offer a home delivery service (5aday box) as well as a drive through service for you to come and pick up your groceries direct from us at the farm.

## How to contact Heritage about your personal data

If you have any requests about your personal data or queries with regard to how we handle your data you can contact our Data Protection Officer (DPO) by phone on +44 (0) 1380 860968, email [privacy@heritagefinefoods.co.uk](mailto:privacy@heritagefinefoods.co.uk), or write to us at Data

Protection Officer, Heritage Fine Foods Ltd, Lowerfields Farm, Coate, Devizes, SN10 3LQ. In this notice DPO means Data Protection Officer.

### **Why Heritage processes personal data**

Heritage collects and processes personal data in order to provide its services and product sales. Our services include the delivery of food produce to catering establishments, for home delivery and through our drive thru service.

In order to provide these services, we collect data directly from individuals through online forms, print and online applications, in email, over the phone and in person.

The table below shows Heritage’s data processing activities in more detail.

<b>Activity</b>	<b>Purpose of Processing</b>	<b>Lawful basis</b>
Being a Heritage supplier	Giving information about Heritage price lists Ordering / purchasing produce	Consent
Staff/recruitment	Applying for a job at Heritage Training References Employment records	Legitimate interests/consent Legitimate interests Legitimate interests Contractual/legitimate interests
Subscribing to Heritage newsletters and emails	Giving information about products, promotions and events	Consent
Being a Heritage Customer	Giving information about upcoming orders Ordering and purchasing produce Feedback and complaints	Consent Contractual Legitimate interest
Making an enquiry		

### **The legal basis on which Heritage processes personal data**

Heritage relies upon different legal basis for the processing personal data according to the relationship and purpose for which it is collected, as explained below.

#### **Contractual**

We need to process personal data about individuals, and those enquiring about our work, in order to deliver and administer the services that we provide.

Individuals can update their preferences or unsubscribe from emails by clicking on the link at the bottom of newsletter mailings received.

The contract with customers includes using personal data for the booking of an order with us. We may also send previous customers information about products and services that we think will be of interest to them. Customers can opt out of any of these communications at any time.

### **Legitimate interest**

Heritage keeps regular customers informed of its activities and new services/products via updates on the basis of legitimate interest. It is in both the interest of Heritage and the customer that they are aware of the offers that they can benefit from. This kind of information is also a legitimate part of what a customer might reasonably expect to receive. These updates take place periodically via email or telephone calls.

Individuals can update their preferences or unsubscribe from emails by clicking on the link at the bottom of newsletter mailings received.

### **Consent**

Heritage seeks consent from individuals, subscribers and customers and anyone who enquires about Heritage products and services to send them marketing information. Consent is sought for:

Marketing information about Heritage's products and services.

Marketing information about any promotions, events, networking and events attending or running by Heritage.

For each of these areas of activity, marketing consent is sought by channel for email, telephone and post. Some additional optional information can be provided so that the information that we deliver can be more tailored and relevant to your stated interests.

### **Compliance with a legal obligation**

In the event that Heritage is contacted directly by a prospective employer or client to verify the status of an individual, Heritage will seek the consent of the individual concerned before releasing any information. We may be required in some cases by law to disclose details without your consent e.g. on a request from the police.

### **How Heritage uses data for marketing purposes**

## Consent

Heritage gains marketing consent from individuals in several ways:

online through a self-registration process

in person at an event

In accordance with the DPA, Heritage requires marketing consent to be freely given, specific and fully informed. It is revocable at any time and Heritage keeps a digital record of your consent in our CRM systems, including when consent is given or withdrawn.

Marketing consent has to be given directly to Heritage by the individual concerned and cannot be given by a third party. If your personal data is passed to Heritage from a third party with your consent, such as a referral from a partner, employer or agent, consent for further marketing communication, if relevant, will be gained directly from you by Heritage.

If you opt into marketing, Heritage will use your personal information to send you the information that you have consented to receive about services and products that will be most relevant to you. We will never pass your personal data to third parties for marketing purposes.

If at any point you would like to opt-out of receiving communications from Heritage, or would like to change the channels that we use to contact you (such as email or post) you can do this by clicking on the link at the bottom of the last email you have received or contact us directly at email [privacy@heritagefinefoods.co.uk](mailto:privacy@heritagefinefoods.co.uk) or write to the Data Protection Officer at Heritage Fine Foods Ltd, Lowerfields Farm, Coate, Devizes, SN10 3LQ or call on +44 (0) 1380 860968

## Recipients of personal data for processing on Heritage's behalf

In carrying out our business, including meeting our obligations to subscribers, customers and other stakeholders, Heritage does not currently use specialist sub-contractors. However if we do use services in the future we will ensure that all the suppliers that we work with are required to respect your privacy and abide by all data protection laws.

## Retention periods

Relations	Retention period
Newsletter subscribers	As a subscriber your data will be retained for so long as you interact with Heritage's newsletter. Your subscriber account will be maintained for an 18 month period since last

	contact, after which time we will contact you to check you still wish to hear from us.
Customers	Heritage retains the data of customers for our services for the statutory accounting period of 7 years.
Enquirers	Heritage will use the personal data that you give us in the course of an enquiry to answer your query and support any follow on actions that arise from it. If the enquiry progresses into a relationship with Heritage your personal data will be held as part of that relationship. If the enquiry does not progress, your data is deleted 6 months after your last contact with Heritage. Before the data is deleted, we will send you a message so that you are aware of our actions.
Financial transactions	Records of all financial transactions (excluding payment details) are maintained for 7 years and then securely destroyed.
Job Applicants	Recruitment record of successful candidates are transferred to staff files for the period of employment plus 18 months. Records of unsuccessful candidates are destroyed after 6 months from interview date.

### **Data subject's rights**

You have the following rights in respect of your personal data. In order for you to exercise these rights at Heritage we will need to confirm your identity. This may be by you providing your customer number or a form of ID such as a passport or driving licence so that we can verify that you are the data subject before releasing information to you.

The right to be informed – you have the right to be told about the collection and use of the personal data you provide. This privacy notice sets out the purpose for which we process your personal data, how long we will keep your data and with whom we will share your data. If you have any questions on how and why we process your data, please contact the DPO. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

Right of access – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the

ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

Right to rectification – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

Right to erasure – this right, often referred to as the right to be forgotten, allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

Right to restrict processing – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

Right to data portability – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and where that processing is by automated means. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

Right to object – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public

interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.

Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.

Scientific/historical research and statistics – your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

Rights relating to automated decision making including profiling – you have rights in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

## **Processing based on consent**

Where Heritage processes your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe option in any marketing that we send you via the link at the bottom of the email received.

## **The right to lodge a complaint to a supervisory authority**

If you are unhappy with any aspect of our handling of your data you can make a complaint to the Data Protection Officer (privacy@heritagefinefoods.co.uk) at Heritage who will consider the matter for you. If you are still not satisfied, you can make a complaint to the Information Commissioner's Office – <https://ico.org.uk/concerns/>

## **Cookies Policy**

Please refer to our separate cookies policy for full information.

## **Third party websites**

Our website may contain links to other websites that are outside our control and are not covered by this privacy notice. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours

## **The security of the personal data that Heritage processes**

Heritage protects the personal data that it holds with technical and organisational security measures. Our cyber security arrangements and framework of data protection policies, procedures and training are kept under regular review to ensure that we keep the data we hold secure.

## **Changes to the privacy notice**

This privacy notice was republished on 11 August 2020. It is regularly reviewed and will be updated when necessary. If we make any significant changes we will communicate them to you.

## **Queries**

If you have any queries about the policy and how it affects you, please contact the Data Protection Officer via privacy@heritagefinefoods.co.uk or in writing to DPO, Heritage Services, 6C Hopton Industrial Estate, Devizes, SN10 2EU