



Golden Acre (“GA”) Customer Privacy Notice **For the Financial year 2020**

Background:

GADF Holdings Ltd (and its subsidiaries) of Chertsey Gate East, 43 - 47 London Street, Chertsey, Surrey, KT16 8AP understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

2. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

The personal data that we use is set out in Part 4, below.

3. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.

The right to restrict (i.e. prevent) the processing of your personal data.

- e) The right to object to us using your personal data for a particular purpose.
- f) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- g) Rights relating to automated decision-making and profiling. We do not use your personal data in this way



For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

4. What Personal Data Do You Collect?

We may collect some or all of the following personal data but not limited to (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Payment information;
- Where customer complaints are concerned, a brief medical history, and information regarding symptoms, medical visits and appointments may be collected:

5. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. Acceptable lawful basis are:

(a) Consent: you have given clear consent for us to process your personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with us, or because you have asked us to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you or your business. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.



- Communicating with you. This may include responding to emails or calls from you.
- Resolving a complaint.
- Supplying you with information that you have opted-in to (you may unsubscribe or opt-out at any time by writing to us telling us so).

6. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

7. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. However, on some occasions we may have to send personal data to our manufacturing partners abroad when discussing consumer complaints.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- Password protecting all electronic systems.
- Secure storage and destruction of non- electronic media

8. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to two important exceptions.

Firstly, as noted in paragraph 7 and secondly, in some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email shown in Part 10. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will aim to respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.



10. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: **dataprotection@goldenacrefoods.com**

Telephone number: **0203 598 8300**

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection

Signed on behalf of Golden Acre Foods Ltd

Neale Powell-Cook
Managing Director