



Golden Acre (“GA”) Web 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 and shared online. We respect and value the privacy of everyone who visits this website (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulations “GDPR” EU Regulation 2016/679
“We/Us/Our”	means GADF Holdings Ltd (and its subsidiaries) of Chertsey Gate East, 43 - 47 London Street, Chertsey, Surrey KT16 8AP.

Information About Us

2.1 Our Site is owned and operated by us.

What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.



Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:
- The right to be informed about our collection and use of personal data;
 - The right of access to the personal data we hold about you;
 - The right to rectification if any personal data we hold about you is inaccurate or incomplete;
 - The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, but if you would like us to delete it sooner, please contact us);
 - The right to restrict (i.e. prevent) the processing of your personal data;
 - The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - The right to object to us using your personal data for particular purposes; and
 - Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following data:

- Name and date of birth;
- gender;
- business/company name;
- job title;
- profession;
- contact information such as email addresses and telephone numbers;
- demographic information such as post code, preferences, and interests
- IP address;
- Web browser type and version
- operating system;
- a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;



How Do We Use Your Data?

6.2 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying Our products and/or services to you (please note that we require your personal data in order to enter into a contract with you);
- Personalising and tailoring our products and services for you;
- Replying to emails from you;
- Analysing your use of Our Site to enable us to continually improve Our Site and your user experience;

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties whose content appears on Our Site may use third party Cookies, please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above or for as long as we have your permission to keep it.

Your data will only be stored in the UK.

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through Our Site.

Do We Share Your Data?

Save as after mentioned, we will not share any of your data with any third parties for any purposes.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.



What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

How Can You Control Your Data?

In addition to your rights under the GDPR, when you submit personal data via Our Site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

Your Right to Withhold Information

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data

You may restrict our use of Cookies.

How Can You Access Your 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 14.

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 respond to your subject access request within one month and, in any case, not more than 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.



Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be asked to consent to set those Cookies. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Our Site may use analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact us on dataprotection@goldenacrefoods.com. Please ensure that your query is clear, particularly if it is a request for information about the data, we hold about you.

Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Signed on behalf of Golden Acre Foods Ltd

Neale Powell-Cook
Managing Director