

# GDPR & Privacy Policy

## KEY SUMMARY

This website only collects data that you enter into the website, for example, to submit an enquiry. If you subscribe to any of our mailing lists, we will use your information to send you the information you have requested.

We use cookies which collect information about the usage and performance of our website. The information that the cookies collect is anonymous. We use this information to analyse usage of our website by visitors to improve its performance and to inform decisions about content, layout and operation of the website and our services or products.

This notice explains what data we process, why, how it is legal, and your rights.

## ABOUT US AND THIS NOTICE

This website ("our site") is operated by a member of the Premier Foods group of companies, the ultimate holding company of which is Premier Foods plc (registered in England and Wales with company number 05160050 and registered address Premier House, Centrium Business Park, Griffiths Way, St. Albans, Hertfordshire, AL12RE, United Kingdom).

All references to "our", "us", "we", "company" or "Premier Foods" within this policy are deemed to refer to Premier Foods plc, its subsidiaries, affiliates and associates. We are a "controller" for the purposes of the General Data Protection Regulation (EU) 2016/679 ("Data Protection Laws").

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights.

## How to contact us

If you have any questions about this Privacy Notice, how we handle your personal data, or want to exercise any of your rights, please contact our Data Privacy Officer, as follows:

By post: Premier House, Centrium Park, Griffiths Way, St Albans, AL1 2RE

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By email: [privacy@premierfoods.co.uk](mailto:privacy@premierfoods.co.uk)

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## Changes to the Privacy Notice

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

## WHAT PERSONAL DATA DO WE COLLECT AND WHY?

### Personal data provided by you

This can fall into a number of categories, depending on your use of our website, as follows:

Site Usage	Data Collection and Usage
Visitors only	If you are just browsing our website we will not collect personal data.
Information you submit	We process personal information about you (such as your name, address, email address and telephone number and anything else that you provide to us) when you contact us by filling in an enquiry form, in order to respond to the enquiry or complaint you are making.
Purchasing through our Website	If you purchase a product through our website we will process the following personal information provided by you: Salutation, first name, last name, email, address, credit card details or cheque information. Your personal information will be processed to enable us or our third party partners to provide you with the purchased product and to deal with any enquiries or complaints you have in relation to your purchase.

Email subscriptions and Investor alerts	If you sign up to receive investor alerts, we will use your name, occupation and email address to send you the material you have requested. You can unsubscribe at any time by contacting us at the details set out above or clicking the unsubscribe link in the emails that you receive.
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Competitions	Competitions have a separate privacy notice, so please see competition terms and conditions on the appropriate website for further information.
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### **Sensitive personal data provided by you**

We do not collect any sensitive personal data about you.

### **Personal information about other individuals**

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on their behalf and has agreed that you can.

### **HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?**

We are allowed to process your personal data on the basis that it is in our legitimate interests to:

- monitor how our website is used in order to improve it. We use aggregated data to do this so it does not impact on your privacy;
- respond to enquiries, complaints and requests in order to serve our customers. We will only use your personal data for this purpose. If you are an existing customer, we may add information about the enquiry, complaint or request to other records we hold about you so we can provide a better customer service; and
- send you material you have requested, using the data you have provided.

Please be aware that you have the right to object to the processing of your data for any of the legitimate interests identified.

### **WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?**

Like any business, we may use third party service providers to operate our website, customer service management, or product sales / payment processing functions. Some of these service providers will process your data as part of the services they offer to us. We take steps to ensure that our service providers treat

your data in accordance with the law; only use it in accordance with our contract with them; and, keep it secure.

Service Provider	Reason for data processing
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Adare International	Processing Recipe book purchases and distribution.
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AWS Cloud Services	Cloud computing services provider.
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CPM International Group	Customer services intermediary.
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Investis	Providing investor alerts.
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Kinsey PR T/A Cirkle	Brand and Food Service email communications.
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NetConstruct	Website hosting administration.
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CognitoForms LLC	Cloud-based WebForms provider
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20-Ten Agency	Competition Management and Prize Fulfilment.
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McCann Advertising Dublin Limited	Advertising agency who manage our Bisto Ireland Facebook page and, who may request and use your personal data to respond to consumer queries submitted via the Bisto Ireland Facebook page. If you submit a consumer query via the Bisto Ireland Facebook page, your personal data may be passed on from the advertising agency to us or to our customer services intermediary in order to allow your consumer query to be dealt with.
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Shopify	Provides the e-commerce platform on the Be-Ro and McDougall's websites to enable us to receive consumer orders for recipe books, process payment and to enable email order confirmation and despatch notices to be sent to the consumers, regarding their order.
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Shopify are the payment provider for Be-Ro and McDougall's recipe book purchases. If you visit our Be-Ro or McDougall's website and click "Buy now" or "Purchase here" you will be redirected to a payment website page hosted by Shopify and, Shopify will collect your personal data submitted with your recipe book order (including your bank details), to process your payment and will be, the "controller" for the purpose of Data Protection Laws. Please make yourself aware of Shopify's Privacy Policy before placing an order for a recipe book: <https://www.shopify.com/legal/privacy>

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Digital Blonde	Marketing Agency
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Active Consultancy Ltd	Branded consumer competition prize fulfilment agency.
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## How we keep your data secure

We strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

## WHEN WILL WE DELETE YOUR DATA?

The table below provides details about how long we will hold your data.

Data we process	How long this will be held for
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Cookies / Analytics data	IP addresses are only collected in relation to competition entries, and data is held for up to 6 months after the end of the competition to monitor any fraudulent activity.
Information from enquiry forms	Until the enquiry has been completed and no further responses are received, and for a period of up to 1 year after.
Complaints data	For a period of up to 6 years from date of last contact. If you have an existing complaint on file, the new complaint may be added to other information that we hold about you as a customer.
Order details	When you place an order, we'll keep the personal data you give us for up to 7 years so we can comply with our legal and contractual obligations.
Subscription / marketing requests	Until you tell us that you no longer wish to receive the subscription or marketing material.

## YOUR RIGHTS

As a data subject, you have the following legal rights:

- the right of access to personal data relating to you
- the right to correct any mistakes in your information
- the right to ask us to stop contacting you with direct marketing
- the right to prevent your personal data being processed in some circumstances
- The right to object to processing of your data where processed on the grounds of legitimate interests
- the right to erasure in some circumstances

If you would like to exercise your rights, please contact us using the details set out above.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond

within three months.

Please note that exceptions apply to some of these rights which we will apply in accordance with the law.

### **Complaints to the Regulator**

If you do not think that we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible. You also have the right to complain to the Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk](http://www.ico.org.uk).