

# Privacy Policy

## 1. Introduction

We, Orchard House Foods (“We” “Our” “Us” “OHF”), are committed to protecting and respecting your privacy.

This privacy policy explains how We use any personal data you provide to Us during or arising out of:

- a. your use of Our website at the domain name, ["www.ohf.co.uk"](http://www.ohf.co.uk);
- b. all correspondence, related submissions, content or other material exchanged between OHF and you; and
- c. all interactions with Us made via Our Website or other communications channels.

Personal data is any information which personally identifies you, and can include your name, address or email address. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it. By accessing, browsing or otherwise using Our Website you confirm that you have read and agree to this privacy policy.

## 2. Data controller

Our Website is owned and operated by Orchard House Foods, which for the purpose of data protection laws is the data controller.

## 3. Data We will collect from you

We retain information which is provided by you directly and information that is passively or automatically collected from you. Specifically, We will collect and process the following data from you:

- Information that you provide when filling in forms on Our Website.
- Information that you provide when corresponding with Us;
- Information that you provide in answers to surveys which we ask you to complete for research purposes (although you do not have to respond to these surveys);
- Details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources and links that you access;
- Information you provide about yourself any time you contact Us through social media;
- Information provided to us from third parties (including our Group companies); and
- Any other information which you may provide to us when using our Website.

We do sometimes collect sensitive personal data or special category personal data which you may provide to Us through the forms on Our Website related to health such as allergies or other health conditions that affect your diet. We treat this information in accordance with the additional protection it is given under data protection laws. We only collect and use this personal data where you have provided Us with your consent for Us to do so.

#### **4. Storing your personal data**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. The personal information that you provide will be retained by Us in accordance with applicable laws and our internal retention policy. We will only hold your personal information on Our systems for as long as is necessary for the relevant purpose for which it was collected.

We will take all reasonable steps to destroy or de-identify personal information We hold if it is no longer needed for the purpose for which it was collected.

#### **6. Uses made of the data**

We use data held about you for the following reasons and in the following ways:

When necessary for our legitimate interests:

- To ensure that content from Our Website is presented in the most effective manner for you and for your computer; and
- To allow you to participate in interactive features of Our service.

When you consent:

- For certain types of targeted marketing and advertising purposes which are subject to your consent; and
- To allow Us to contact you to discuss your product query or complaint and to follow up afterwards with a short survey.

When there is a legal and/or regulatory obligation:

- To comply with applicable laws where We are obliged to retain and/or disclose certain information; and
- For internal and external auditing purposes.

#### **7. Disclosure of your data**

We will disclose your data to the Consumer Care Team of OHF any necessary member of the Orchard House Foods for the purposes of dealing with your query or complaint.

We will disclose your personal data to third parties:

- If we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, your data may be one of the transferred assets and you acknowledge that such transfers may occur and are permitted by this privacy policy;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website terms + conditions of use and other agreements; or to protect the rights, property, or safety of OHF, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- In order to provide relevant customer care. Please note that the personal data processed relating to customer care is held in a separate database and is not used for marketing purposes.

## **8. Marketing**

Where you have provided Us with the appropriate consents to Our general marketing, We will send you marketing materials about other products or services offered by OHF. As stated above, personal data processed relating to customer care is not used for marketing purposes.

You have the right to object to the use of your personal data for marketing purposes. You can exercise your right to prevent such processing at any time by emailing Us at [consumercare@ohf.co.uk](mailto:consumercare@ohf.co.uk) or by clicking “unsubscribe” on the relevant email communication(s).

## **9. International transfers**

The data We collect from you may be transferred to and stored at a destination outside the European Economic Area ("**EEA**"). Your data may be processed by staff operating outside the EEA who work for Us or for one of the third parties to whom We may disclose your personal data (see paragraph 7 above). We will only transfer your data outside of the EEA where we have taken appropriate steps to make sure it is carefully protected, for example by entering appropriate contracts approved by data protection regulators with those relevant third parties.

## **10. Your rights**

You have the right to access information which We hold about you and details of how We use that information. You also have the right to ask Us to provide a copy of this information in a portable format to you or another third party.

If any of the data We hold about you is incorrect, you may also request it is corrected or erased. You also have a right to require Us to stop processing your personal information and/or to withdraw your agreement to processing based on "consent", unless we have a legal justification for doing so.

To exercise your rights you can email Us at [consumercare@ohf.co.uk](mailto:consumercare@ohf.co.uk) and We will respond to your request within one month. In the rare event We can't respond within one month We will let you know this as soon as possible.

## **11. Links to other Websites**

Our Website may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **12. Changes to Our privacy policy**

We reserve the right to change the contents of Our Website. Any changes We may make to Our privacy policy in the future will be posted on this page. It is your responsibility to familiarise yourself with the privacy policy regularly. Your continued use of Our Website following the posting of any such changes will constitute your acceptance of the revised policy.

## **13. Contact**

Questions, comments and requests regarding this privacy policy or how your personal information is handled, including requests to exercise your rights set out in this policy, should be emailed to [consumercare@ohf.co.uk](mailto:consumercare@ohf.co.uk) with the subject heading Privacy Policy Monitoring.

## **14. Complaints**

If you have any concerns or complaints as to how We have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO. The ICO can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

We ask that you please attempt to resolve any issues with Us before contacting the ICO by emailing Us at [consumercare@ohf.co.uk](mailto:consumercare@ohf.co.uk).