



General Data Protection Regulation (GDPR) - How we look after your data.

This Privacy Notice explains what this means to you

What is GDPR?

New legislation came into effect on 25th May 2018 which changes the obligations for businesses that store and process data on individuals. As a valued customer, the regulations apply to the data we hold about you.

This notice (called a Privacy Notice) explains the data we hold about you, why we hold it, how long we hold it for and your rights to access and review your data should you wish to.

Don't worry, as a company we take our responsibilities for the safekeeping of your personal data very seriously. We have been doing so for many years and, until the GDPR came along, we were bound by the provisions of the Data Protection Act 1998 (DPA). The GDPR extends the requirements that were included in the DPA previously, so we are used to handling personal data responsibly.

What personal data we hold about you and how we use it

We hold personal data about you for a variety of reasons. In GDPR speak, these reasons refer to 'lawful bases'. Our reasons for holding personal data about you are outlined below.

1 Supplying goods and services to you

We hold the necessary details to enable us to service your account and fulfil your orders, for example, we hold your business name, address, contact telephone numbers and email address. If you have multiple establishments, we will hold these details for each location. If you would like people who work for you to be contacted regarding account maintenance or to facilitate orders we will typically hold their personal data such as name, job title, email address and telephone number.

Occasionally, and with your agreement, we will hold additional delivery instructions to help us deliver your orders.

When you become a customer, we ask you to supply certain information (see details under "What data do we hold?") prior to opening an account. This includes business references and we may perform reasonable checks by accessing data from third party credit reference agencies (e.g. Experian) using your personal details.

We may hold bank and credit card payment details but only if asked to do so. If we do, the card details we store are in an encrypted form to protect them.

To help us to better understand your buying preferences and to provide outstanding levels of customer service, we use your order and payment history with us.

2 Enhancing your customer experience

As a valued customer, we want to develop your business with us through active account management. Our team will contact you on a regular basis to develop a better understanding of your evolving business and will gather relevant information from you. We may, for example, discuss your pricing requirements and ask for copies of your menu or an image of something pertinent to you or your business. Your feedback is important to us, we welcome your comments and will record them so that we can respond.

3 Marketing and communications from us

Our tailored communications are created with the aim of providing you with relevant inspiration to add value to your business. We communicate via post (e.g. our 'Flavour of the Month' brochure) and digitally (e.g. seasonal fresh produce updates). We print clear details of how to stop receiving mailed communications. You can unsubscribe from our emails directly by clicking clear links.

4 For your protection

We hold some data specifically to protect our customers and employees. Our telephone conversations with you are recorded for the purposes of training and improving our service, for example, we are able to replay orders placed on our answerphone service to help us achieve 100% accuracy. We record CCTV images within and around our vehicles, this is an important protection measure used to improve security and to support investigations into incidents.

Within GDPR we must have a lawful basis for holding and using your data. Lawful bases are important because they affect the rights you have to access and review your data (we discuss this in a later section). In supplying goods and services, our lawful basis is concerned with fulfilling our "Contract" with you. For the other reasons, we rely on the fact that we have a "Legitimate Interest" in using your data for the purposes explained in this document. For ongoing direct marketing communications, we rely on your continued consent. We will only use your personal data for the purposes which we collected it, if we need to process your personal data for an unrelated purpose, we will notify you beforehand.



What data do we hold?

The diagram below shows the specific personal data we hold about you under each reason.

Supplying goods and services to you (Contract)



For your main office and each delivery location:

- The address of your premises and, where required, your private address
- Contact details for key members of your team including: your full name, position, telephone numbers, social media contact details and email addresses
- Special instructions that apply to your delivery locations
- Your contact details enable us to respond to any enquiry you make - to tell you about any changes to our service to provide food safety, quality or other information in relation to products you have purchased from us or enquired about
- Your bank account details
- Payment card details (if you pay by card). Card details are stored in an encrypted form to protect them
- Business details, including, trade references and names and addresses of directors, partners or proprietors
- Your purchase order history with us
- Your payment history and trading account with us

Enhancing your customer experience (Legitimate Interest)



- Pricing quotations – these are sent to a named person within your company
- Things you provide that help us understand your business – e.g. copies of menus, marketing literature, images. These are relevant because they may include names of people, for example the proprietor's name
- If you request direct contact from a supplier, we will share your name, address, telephone numbers and email address.
- Details of our communications throughout our business relationship including emails, letters and telephone conversations. These records may be in handwritten or electronic form

Marketing and communications from us (Legitimate Interest and your Consent)



- Your name, address and email details to enable us to send you our regular marketing communications (e.g. 'Flavour of the Month', seasonal fresh produce updates and general business updates)
- Your contact details to provide you with information about products and services that are similar to those that you have previously purchased from us, or that you have expressed an interest in
- We monitor how you access and view email marketing communications. We also monitor how you use our Website. This helps us better understand what interests you, so we can improve our communications. The data we may gather includes: data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use
- Profile Data including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences

For your protection (Legitimate Interest)



- Telephone calls we make to each other
- CCTV recordings in and around our vehicles



Where do we get your personal data from?

The personal data we hold about you generally comes from you. It is captured in a variety of ways both directly and indirectly. An example of direct capture includes the details you complete on our new customer account application form. Indirect data includes your purchasing activity and monitoring the way you browse our Website and view emails. Most of the information we hold is transactional in nature – based on your orders with us. We also record notes from meetings and conversations with you. We hold these records in written form and on our IT systems. This data is used to help us gain a more effective understanding of your needs, interests and preferences so that we can better tailor our communications and activities.

We may also receive information about you and your business from nominated business trade referees and credit reference companies such as Experian.

How we protect your data

We store our data within the EU / EEA. We hold data on paper records, securely stored, and on our IT systems. We use password security to limit access to our computer systems and ensure that those who access them have appropriate access to fulfil their legitimate interest in the data we hold.

Our employees and data processing partners are subject to a duty of confidentiality when handling your data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long do we hold the data for?

We will only use and store information for as long as it is required for the purposes it was collected. How long information is stored depends upon the information in question and what it is being used for. We maintain your personal data for as long as you trade with us. If you should cease trading with us we will hold your trading data for a period of up to 8 years to fulfil our legal obligations. Some data, such as telephone recordings, are kept for a maximum of 12 months. Credit card details are deleted if you close your account with us or if you ask us to.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who do we share your data with?

We share your data with carefully selected, professional organisations (called “Processors” under GDPR) who we partner with to support your business with us. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. A list of these organisations is provided below.

- **Postal mailing companies**
- **DPS Ltd. for tableware orders**
- **Selected suppliers (to arrange samples, point of sale materials or sales accompaniment visits, but not without your consent)**
- **Organisations to complete business credit and trading references – e.g. Experian**
- **To fulfil third party business trading reference requests.**
- **Selected courier companies (to make special deliveries to you)**
- **Organisations that process bank payments– e.g. SagePay.**

We may also share your data with:

- **Card processing companies (where necessary for card payments) including Sage Pay**
- **Government bodies, regulators, courts, tribunals, law enforcement agencies, insurance agencies, where we are required to do so:**
- **To meet our legal obligations**
- **To support our legal rights (e.g. in court cases)**
- **To assist with the prevention, detection and investigation of crime**



Your rights to review the data we hold

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (not applicable where it is necessary for us to use the data for a lawful reason)
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Some of these rights may be limited depending on the lawful basis for which the data is processed.

You have the right to access the data we hold about you by submitting a "Subject Access Request". Details of how to do this are included in the next section.

You have the right to object to us using your personal data, however, this may affect our ability to service your account. If you object, we will make you aware of the implications of doing so.

We will have asked you for your consent to send you direct marketing and communications materials when you opened your account with us by completing: New Customer Information Form.

You have the right to ask us to stop sending you direct marketing and communications at any time as outlined in this document.

Who you can contact if you have a query

If you have a query, if you wish to object to us using your personal data, if you wish to make a complaint about how we have handled your personal data, or if you wish to make a Subject Access Request, you can contact the company's GDPR administrator by emailing: **gdpr@pilgrimfoods.co.uk**

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO). The ICO is the UK supervisory authority for data protection issues.

Pilgrim Foodservice Ltd. is the "Controller" of your personal data. Our business address is: Marsh Lane, Boston, PE21 7SJ. You may write to us at this address.

Review of this privacy policy and your duty to inform us of changes

We keep this Policy under regular review. This Policy was last updated on 24.07.18.

We may change this privacy notice from time to time. If so, we will notify you by email or website update or otherwise.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

