



ALBION FINE FOODS LIMITED – PRIVACY NOTICE

1 IMPORTANT NOTICE

This is the Privacy Notice of Albion Fine Foods Limited (company number 10379589) whose registered office is at 3rd Floor 7 Howick Place, London, SW1P1BB (“**the Company**”, “**we**”, “**us**” or “**our**”) and sets out how we collect and process your personal data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data. Please read this Privacy Notice to understand how we may use your personal data.

This Privacy Notice relates to personal data that identifies “**you**” meaning customers or potential customers, suppliers, individuals who browse our website, and individuals outside our organisation with whom we interact. If you are an employee, contractor or otherwise engaged in work for us or applying to work for us, a separate privacy notice applies to you instead.

This Privacy Notice is not intended for children and we do not knowingly collect personal data relating to children. Additionally, this Privacy Notice is not intended to apply to personal data collection during the recruitment of employees, for which there is a separate privacy notice.

This Privacy Notice may vary from time to time so please check it regularly. This Privacy Notice is updated and reviewed annually.

2 HOW TO CONTACT US

Controller

This Privacy Notice applies where we are a controller in respect of your personal data – this is where we decide how and why your personal data is processed.

If you wish to correct your personal data held by us or to opt out at any time from receiving marketing correspondence from us or to alter your marketing preferences please contact info@albionff.co.uk.

If you need to contact us in connection with our use or processing of your personal data, or gain access to it then our contact details are info@albionff.co.uk / 01732757900.

3 CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data about you that we may collect, use, store, share and transfer are:



- **Individual Data.** This includes personal data which relates to your identity, such as your name, username or similar identifier, title, date of birth and gender, company details and your contact details such as your billing address, delivery address, email address and telephone numbers;
- **Advertising Data.** This includes personal data which relates to your advertising preferences, such as information about your preferences in receiving marketing materials from us and our third parties and your communication preferences;
- **Information Technology Data.** This includes personal data which relates to your use of our website, such as your internet protocol (IP) address, login data, traffic data, weblogs and other communication 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 to access our website;
- **Account and Profile Data.** This includes personal data which relates to your account or profile on our website, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. [Where permitted, this may involve the use of profiling];
- **Economic and Financial Data.** This includes personal data which relates to your finances, such as your bank account and payment card details and information which we collect from you for the purposes of the prevention of fraud;
- **Sales Data.** This includes personal data which relates to the transactions you have conducted with us, such as details about payments to and from you, details of subscriptions to our services or publications and other details of products and services you have purchased from us;
- **Audio and Visual Data.** This includes personal data which is gathered using our CCTV or other recording systems in the form of images, video footage and sound recordings that is taken at any of our locations;
- **Health Data.** This includes personal data which is gathered for health and safety purposes including any accident report or claim log or any information you provide about allergies or other medical conditions in one of our locations;
- **Market Research Data.** This includes personal data which is gathered for the purposes of market research, such as price comparison information.

We may also create personal data about you, for example, if you contact us by telephone to make a complaint, for example about our services or goods, then we may make a written record of key details of the conversation so that we can take steps to address the complaint.

We also obtain and use certain aggregated data such as statistical or demographic data for any purpose ("**Aggregated Data**"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your Information Technology Data to calculate the percentage of users accessing a specific feature on our website. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.



In addition, we may obtain certain special categories of your data / sensitive personal data, and this Privacy Notice specifically sets out how we may process these types of personal data. The special categories of data are: (i) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and (ii) the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We do not collect any information about criminal convictions and offences.

4 THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- **Directly from you**, either in person (at our locations or otherwise), via our website or by telephone or via hand held PDAs. This could include personal data which you provide when you:
 - (a) place an order for our products or services;
 - (b) create an account on our website;
 - (c) subscribe to our publications;
 - (d) request information on our products or services or for other marketing to be sent to you;
 - (e) enter into a competition or promotion;
 - (f) complete a survey from us or give us feedback.
- **Via automated technologies**, such as CCTV or other recording systems, cookies, server logs and other similar technologies. We may automatically collect Information Technology Data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies. We may also receive Information Technology Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **From someone else**, such as:
 - (g) analytics providers;
 - (h) our provider of customer feedback;
 - (i) advertising networks;
 - (j) search information providers;
 - (k) providers of technical, payment and delivery services;
 - (l) data brokers or aggregators;
 - (m) providers of social media platforms (including but not limited to platforms such as X, Facebook (Meta), TikTok, LinkedIn, and Instagram) for example where you share our content through social media, for example by liking us on X, Facebook, LinkedIn, TikTok or by following or posting about us on any social media platform.
- **From publicly available sources**, such as:
 - (n) Companies House;



- (o) the electoral roll; and
- (p) HM Land Registry.

5 HOW WE USE YOUR PERSONAL DATA

The law requires us to have a lawful basis to process your personal data.

Where we may rely on consent

For certain purposes it may be appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

In the event that we rely on your consent, you may at any time withdraw the specific consent you give to our processing your personal data. Please contact us using the contact details set out in paragraph 2 to do so. Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other lawful bases to process your personal data for other purposes.

Examples of when we may rely on your consent to process your personal data include:

- where, in the provision of our products and services to you, we need to use your sensitive / special category personal data;
- where we would like to use photos or images taken of you in promotional materials;
- where we or our carefully selected third parties have new products and services which we think you will be interested in.

Other legal bases we may rely on

Where we are relying on a basis other than your consent, the lawful basis for processing personal data will be one of the following:

- a) the processing is necessary in order for us to comply with our **legal obligations** (such as compliance with anti-money laundering legislation);
- b) the processing is necessary for the **performance of a contract** you are party to or in order to take steps at your request prior to you entering into a contract;
- c) processing is necessary for the establishment, exercise or defence of **legal claims**; or
- d) the processing is necessary for the pursuit of our **legitimate business interests**.

- e) the processing is necessary in order to protect the **vital interests** of an individual e.g. where there is a medical emergency at one of our premises;
- f) the processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in us.

Extra conditions for sensitive personal data

Where we are processing your sensitive / special category personal data one of the following conditions will also apply:

- a) you have given your **explicit consent** to the processing;
- b) the processing relates to personal data which are **manifestly made public** by you;
- c) the processing is necessary for the **establishment, exercise or defence of legal claims**;
- d) the processing is necessary for **archiving** purposes in the public interest; **scientific or historical research purposes or statistical purposes**;
- e) the processing is necessary to protect an individual's **vital interests** where the individual cannot give consent;
- f) the processing is necessary for reasons of **substantial public interest**.

6 PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA AND THE LAWFUL BASIS

Our processing of your personal data will depend on our relationship with you. The table below sets out in more detail the purpose of the processing activities and which of the lawful basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose	Processing Operation	Lawful basis relied on under data protection laws (as relevant and applicable)	Relevant Categories of personal data
Performing our contractual obligations to you	Processing and performing any order placed by you for goods or services	Processing is necessary: <ul style="list-style-type: none"> for the performance of a contract with you in connection with our legitimate business interests in carrying out our business and managing our relationship 	Individual Data Economic and Financial Data Account and Profile Data



		with you	
	Considering feedback and complaints that you may make to us including dealing with refunds or warranty claims	Processing is necessary: <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you • vital interests 	Individual Data Economic and Financial Data Account and Profile Data
	Making or receiving payments, fees and charges	Processing is necessary: <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	Individual Data Economic and Financial Data Account and Profile Data
	Collecting and recovering money owed	Processing is necessary: <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carry out our business and managing our relationship with you 	Individual Data Economic and Financial Data Account and Profile Data
Managing our relationship with you	Sending you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice)	Processing is necessary: <ul style="list-style-type: none"> • for the performance of a contract with you • for compliance with a legal obligation to which we are subject • in connection with our legitimate business interests in carrying out our business and 	Individual Data Account and Profile Data



		managing our relationship with you	
	Providing you with important real-time information about products or services you have ordered from us (e.g. a change of time or location for your service due to unforeseen circumstances)	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject 	<p>Individual Data</p> <p>Account and Profile Data</p>
	Providing advice regarding our products and services to you (or arrange for others to do so at our request)	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	<p>Individual Data</p> <p>Advertising Data</p> <p>Market Research Data</p>
	Sending you information you have requested	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you • for compliance with a legal obligation to which we are subject • in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	<p>Individual Data</p> <p>Advertising Data</p> <p>Information Technology Data</p> <p>Account and Profile Data</p> <p>Sales Data</p> <p>Market Research Data,</p> <p>in each case as relevant and/or required by applicable law</p>
	Dealing with your enquiries	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you 	<p>Individual Data</p> <p>Account and Profile Data</p>



		<ul style="list-style-type: none"> for compliance with a legal obligation to which we are subject in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	Sales Data Economic and Financial Data
	Making suggestions and recommendations to you about goods, brands or services that may be of interest to you, deliver relevant website content and advertisements to you and to measure or understand the effectiveness of our advertising.	Processing is necessary: <ul style="list-style-type: none"> in connection with our legitimate business interests in carrying out our business and managing our relationship with you Or where you have provided us with your consent 	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data
	Communicating with you about, and administering your participation in, special events, programmes, promotions, any prize draws or competitions.	Processing is necessary: <ul style="list-style-type: none"> for the performance of a contract with you in connection with our legitimate business interests in carrying out our business and managing our relationship with you Or where you have provided us with your consent	Individual Data Advertising Data Information Technology Data Account and Profile Data
	For internal purposes to use data analytics,	Processing is necessary: <ul style="list-style-type: none"> for the performance of a 	Individual Data Advertising Data



	to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and to improve our website, products/services, marketing, customer relationships and experiences	<p>contract with you</p> <ul style="list-style-type: none"> in connection with our legitimate business interests in carry out our business and managing our relationship with you 	<p>Information Technology Data</p> <p>Account and Profile Data</p> <p>Sales Data</p>
Administering our business and carrying out business activities	This may involve a variety of processing operations relating to the running of our business, including those set out below:		<p>Individual Data</p> <p>Advertising Data</p> <p>Information Technology Data</p> <p>Account and Profile Data</p> <p>Sales Data</p> <p>Market Research Data</p>
	Protecting our business including to deal with any misuse of our website and to comply with our security policies at our locations	<p>Processing is necessary:</p> <ul style="list-style-type: none"> in connection with our legitimate business interests in carrying out our business and managing our relationship with you for compliance with a legal obligation to which we are subject 	<p>Individual Data</p> <p>Information Technology Data</p> <p>Account and Profile Data</p>
	Using your personal data to comply with our own legal obligations and maintaining our records	<p>Processing is necessary:</p> <ul style="list-style-type: none"> in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	<p>Individual Data</p> <p>Economic and Financial Data</p> <p>Account and Profile Data</p> <p>Sales Data</p>



		<ul style="list-style-type: none"> • for compliance with a legal obligation to which we are subject • vital interests 	
	<p>Enforcing or applying our terms of use, terms and conditions of supply and other agreements with third parties</p> <p>For the purposes of debt recovery</p>	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject 	<p>Individual Data</p> <p>Economic and Financial Data</p> <p>Account and Profile Data</p> <p>Sales Data</p>
	<p>Detecting and preventing fraud and other illegal activities (and to assist regulators, trade bodies and law enforcement agencies in relation to the same)</p>	<p>Processing is necessary:</p> <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject • vital interest of a person • for the performance of a contract with you 	<p>Individual Data</p> <p>Information Technology Data</p> <p>Economic and Financial Data</p> <p>Account and Profile Data</p> <p>Sales Data</p> <p>Audio and Visual Data</p>
	<p>Reorganisation, restructuring, refinancing, selling, making ready for sale or disposal of our business in</p>	<p>Processing is necessary in connection with our legitimate business interests in carry out our business and managing our relationship with you</p>	<p>Individual Data</p> <p>Advertising Data</p> <p>Information Technology Data</p> <p>Account and Profile Data</p>



	whole or in part including to any potential buyer or their advisers		Sales Data Market Research Data
	Investigating and defending any third party claims or allegations	Processing is necessary: <ul style="list-style-type: none"> • for the performance of a contract with you • in connection with our legitimate business interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject • vital interests 	Individual Data Sales Data Economic and Financial Data
	Providing administration and / or IT services Seeking to ensure the security of our IT network	Processing is necessary: <ul style="list-style-type: none"> • in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data
	The development of our business strategy Studying how to develop and the updating of our products and services	Processing is necessary: <ul style="list-style-type: none"> • in connection with our legitimate business interests in carrying out our business and managing our relationship with you 	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data

	Protecting our business and property	Processing is necessary: <ul style="list-style-type: none"> in connection with our legitimate business interests in carrying out our business 	Individual Data Information Technology Data Audio and Visual Data
Compliance with health and safety requirements	Protecting our staff and visitors	Processing is necessary: <ul style="list-style-type: none"> in connection with our legitimate business interests in carrying out our business vital interest of a person 	Health Data Audio and Visual Data

7 WHO RECEIVES YOUR PERSONAL DATA

We may disclose your personal data to:

- our group companies and affiliates;
- third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;
- third parties operating plugins or serving up content (such as Facebook (Meta), TikTok, X, Instagram, LinkedIn) which you choose to interact with. In some of those cases we and that third party may have determined that we are jointly processing your personal data. In those cases we will enter into an appropriate joint controller agreement. In other cases that third party may be a separate controller;
- our PR agency and provider of our App and customer feedback;
- HMRC, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;
- external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation);



8 PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

You must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

9 ACCURACY OF YOUR PERSONAL DATA

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

10 INTERNATIONAL TRANSFERS OF PERSONAL DATA

It is possible that personal data we collect from you may be transferred, stored and/or processed outside the United Kingdom including outside the European Economic Area.

In connection with such transfers we will ensure that:

- a) there are appropriate safeguards in place such as binding corporate rules or approved model contractual clause. A copy of the appropriate safeguard can be obtained by contacting us using the contact details set out in paragraph 2; or
- b) the transfer is to a country that provides an adequate level of protection; or
- c) one of the derogations for specific situations applies to the transfer including explicit consent or necessary for the performance of a contract or exercise or defence of legal claims.

11 HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

We will store your personal data for the time period which is appropriate in accordance with the following criteria:



- (a) the on-going business operation / relationship that we have with you;
- (b) the completion of the purpose for which the personal data was given;
- (c) our legal obligations in relation to that personal data and other legal requirements;
- (d) the type and size of the data held and whether any if it is deemed to be special category personal data; or
- (e) our accounting requirements in relation to that personal data.

We keep the length of time that we hold your personal data for under review. These reviews take place periodically.

12 **CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA**

In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract, or necessary to enter into a contract.

It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you.

13 **USING NEW AND NOVEL TECHNOLOGIES**

We may use generative artificial intelligence tools for **operational and efficiency reasons, such as improving efficiency or include other reasons.**

We rely on our legitimate interest as our lawful basis should we process any personal data, either directly or incidentally, these tools either in the course of the delivery of our services or in the operation of our business.

14 **YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA**

Subject to applicable law including relevant data protection laws, in addition to your ability to withdraw any consent you have given to our processing your personal data (see paragraph 5), you may have a number of rights in connection with the processing of your personal data, including:

- the right to request access to your personal data that we process or control;
- the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- the right to request, on legitimate grounds as specified in law:
 - (a) erasure of your personal data that we process or control; or
 - (b) restriction of processing of your personal data that we process or control;



- the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- the right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 2.

15 TECHNICAL AND SECURITY MEASURES

We take the security of your personal data seriously and have technical and organisational measures to ensure a level of security appropriate to the risk.

We use a mixture of measures including utilising technology to combat cybersecurity, data management techniques, user access and management procedures, physical security and guidelines for personnel.

Our measures are aimed at having the ability to:

- ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; and
 - (a) restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

16 LINKS TO OTHER WEBSITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control unconnected third party websites and are not responsible for any use of your personal data that is made by unconnected third party websites.