

## PICKLED PANTRY LIMITED PRIVACY POLICY

### 1. BACKGROUND

At Pickled Pantry Limited (referred to as “we”, “us”, “our”) we take privacy seriously and we are committed to protecting it. This policy explains when and why we and companies in our group\* (which means our subsidiaries, our ultimate holding company and its subsidiaries from time to time, as defined in section 1159 of the UK Companies Act 2006) collect personal information about individuals, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

This policy applies to you, the user of [www.pickledpantry.co.uk](http://www.pickledpantry.co.uk) (“Site”) and Pickled Pantry Limited the owner and provider of the Site. This policy applies to our use of all personal information collected by us in relation to your use of the Site and any of our services or online communication systems.

This policy may change from time to time so please check this page occasionally to ensure that you’re happy with any changes.

### 2. WHO WE ARE

Pickled Pantry Limited (company number 08004582) is the data controller in relation to the processing activities described below. This means that we decide why and how your personal information is processed. This policy is also relevant to any directors, employees, officers, shareholders, or other relevant parties whose personal information is provided to us.

Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to Pickled Pantry Limited.

### 3. HOW WE COLLECT YOUR PERSONAL INFORMATION

When you use this Site, our products or services, the categories of information that we may collect about you are as follows:

#### **Personal information you give to us:**

This is information about you that you give to us by entering information voluntarily via:

- our Site [www.pickledpantry.co.uk](http://www.pickledpantry.co.uk);
- social media platforms (e.g. Twitter);
- our online communications infrastructure on our Site, including message boards and blogs; and/or
- corresponding with us by phone, email or otherwise,

This includes information provided at the time of enquiring and/or registering to use our Site, subscribing to the services we provide through our Site, posting material or requesting further services, ordering products, and managing your account online (including accessing documentation and engaging in correspondence with us by phone, email or otherwise).

This also includes personal information relating to directors, employees, officers, shareholders, or other relevant parties whose details are provided to us during the term of the contract we have with you.

We may also ask you for information when you report a problem with our Site. If you complete any surveys that we request you complete for research purposes, we will collect information in such circumstances as well. The information you give us includes your name, address, email address and phone number, enquiry details and may include records of any correspondence and responses to any surveys.

#### **Personal information we collect about you:**

We may automatically collect details of transactions you carry out through the Site, and your visits to our Site, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access.

We may also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see [Cookies](#) for further information. We may also collect any personal information which you allow to be shared that is part of your public profile or third party social network, type and version, time zone setting, browser plug-in types and versions, operating system and platform.

**Personal information we may receive from other sources:**

We obtain certain personal information about you from sources outside of our business which may include our group companies\* or other third party companies.

We offer some of our services/products on or through other websites and the personal information that you provide to those sites may be sent to us in order to deliver the service, for example, we appear on some local authority websites as a recommended supplier.

The personal information we may receive from third party companies is contact information.

**4. TYPE OF PERSONAL INFORMATION WE PROCESS ABOUT YOU**

We may process a range of personal information about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers.

<b>Category</b>	<b>Personal information included in this category</b>
Behavioural	your activities, preferences and interests.
Contact	information which can be used to address, send or otherwise communicate a message to you, including name, address, email address, telephone number.
Banking/Billing	information used to receive funds from you.
Credit	your application for credit and information relating to the provision of credit to you.
Employment	your employment details, including profession and job title.
Cardholder	your payment card details.
Sales	information relating to the sale of services/products to you.
Correspondence	information contained in our correspondence or other communications with you about our services, products, systems or business.
Technical	technical information including IP address, web browser type and version, operating system, information about visits to the Site such as URL, clickstream to, through and from the Site.

**5. HOW WE USE YOUR PERSONAL INFORMATION**

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are as follows:

- **Performance of the contract** with you or take steps to enter into it. We may process personal information where we have supplied you (or continue to supply you) with any products and/or

services, where we have arranged for the supply of another company's products or services to you, or where you are in discussions with us about any new product and/or service. We will use this information in connection with the contract for the supply of products and/or services when it is needed to carry out that contract with you or for you to enter into it. This includes sending you your recycling report or other financial, operational and compliance information in relation to the Services. Please see [Type of personal information we process](#) about you above for details of the types of personal information we process for these purposes.

- **Legitimate interests or that of a third party.** This includes:
  - for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services), including tailoring marketing communications to you or your business;
  - where you are acting in a business capacity, to contact you at your business address, email address and/or telephone number with information about our products and services (this does not apply to those acting in their capacity as sole trader or partnerships);
  - to correspond or communicate with you in relation to our products, services or systems, and to facilitate and administer our services to you;
  - to manage your enquires, questions, queries, complaints and claims;
  - for market research purposes or for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our Site);
  - for internal record keeping;
  - to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;
  - for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
  - for prevention of fraud and other criminal activities;
  - to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
  - to assess and improve our service to customers and to provide staff training; ○ for the management of queries, complaints, or claims; and ○ for the establishment and defence of our legal rights.
- **Consent.** This includes contacting you via email, telephone or text with marketing information about our other products and/or services if you sign up via our Site or other medium and indicate that you would like to receive such marketing from us. You may withdraw your consent for us to use your information at any time. Please see [Withdrawing your consent](#) for further details.
- **Compliance with a legal obligation.** This includes: (i) to assist any public authority or criminal investigation body; (ii) to identify you when you contact us; and/or (iii) to verify the accuracy of data we hold about you.
- **Vital interests.** Where we have supplied you with any products, we may use your personal information to contact you if there are any urgent safety notices and/or product recalls to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your **vital interests** for us to use your personal information in this way.

## 6. DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes.

For more information on how we use cookies and how to switch them off on your device, please visit our [Cookies Policy](#) and our section on [Cookies](#) below.

## **7. OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION Our suppliers and service providers**

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management), advertising and marketing agencies, I.T support and services, administrative services, payment handling, collection and/or delivery services/subcontractors, and search engine facilities.

We may also disclose your information to a third party debt collection agency engaged by us to recover monies owned to us, and/or a third party to whom we sell your debt to.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

### **Credit/debit card payment processors**

When you purchase any services online, your credit/debit card payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us using the details at the end of this policy.

### **Customer satisfaction surveys**

As customer satisfaction is important to us, we may ask a third party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our products and services.

### **Other ways we may share your personal information**

We may transfer your personal information to a third party as part of a sale or transfer of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. In this event, you will be notified of the changes.

We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers.

We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

These third parties may share your information with us, which we will use in accordance with this policy. In some cases they will be acting as a controller of your information and therefore we would advise you to read their privacy policy in these instances.

## **8. WHERE WE STORE YOUR PERSONAL INFORMATION**

All information you provide to us is stored on our secure servers which are located within the European Economic Area (EEA).

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA.

If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

## **9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

Subject to the paragraphs below, we will retain your personal information as follows:

- If you have an account with us, we will retain your personal information (including contact, billing, credit, employment, cardholder, and sales information) for as long as your account is active. If your account is dormant for more than 12 months, we'll send you a reminder, after which we will close your account. Please note that after your account is closed, we will no longer provide you with a valid waste transfer note. Once your account is closed, we will retain your personal information in case of any queries from you or in case you decide to re-activate your account for a period of 4 years from the date your account is closed. This is to enable us to provide you with copies of compliance documentation (including consignment notes) to comply with applicable waste collection or waste disposal legal obligations in connection with our services.
- If you have contacted us with a complaint or query we will store your personal information for as long as is reasonably required to resolve your complaint or query.
- We will retain technical information about you for a period of 2 years from the date of your visit to our Site.

### **Retention in case of claims**

We may need to retain certain personal information to establish, bring or defend legal claims against us for 7 years after the date it is no longer needed by us for any of the purposes listed under [How we use your personal information](#), in case we need the information to establish, defend or bring legal claims.

### **Retention in accordance with legal and regulatory requirements**

We will carefully consider whether we need to retain your personal information after the period described above in case of a legal or regulatory requirement. This includes compliance documentation and waste transfer notes.

### **Exceptions**

The exceptions to the above retention periods are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- your account is in debt and you owe money to us;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Erasing your personal information or restricting its processing below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

## **10. SECURITY AND LINKS TO OTHER SITES**

Security is of great importance to us. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our Site and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate

controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Our Site may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our Site from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## 11. COOKIES

Like many other websites, our site uses cookies to help us provide you with a good experience when you browse our site and also allow us to improve our site. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our Sites to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences. Please see our Cookies Policy for further information.

## 12. YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information.** You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Correcting and updating your personal information.** The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy. You can also access your online account at any time to view or amend your information.
- **Withdrawing your consent.** Where we rely on your consent as the legal basis for processing your personal information, as set out under [How we use your personal information](#), you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.
- **Objecting to our use of your personal information and automated decisions made about you.** Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under [How we use your personal information](#), you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data. You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe tool. You may also contest a decision made about you based on automated processing by emailing or writing to us at the address at the end of this policy.

- **Erasing your personal information or restricting its processing.** In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.
- **Transferring your personal information in a structured data file (“data portability”).** Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under [How we use your personal information](#), you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Complaining to the UK data protection regulator.** You have the right to complain to the Information Commissioner’s Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO’s website for further details.

### 13. CHANGES TO THIS POLICY

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our Site and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our Site, whichever is the earlier. We recommend you regularly check for changes and review this policy whenever you visit our Site. If you do not agree with any aspect of the updated policy you must immediately notify us and cease using our services.

### 14. CONTACT US

If you wish to write to us, please write to Pickled Pantry Limited 7 Central Parade, St. Marks Hill, Surbiton, Surrey, KT6 4PJ. Our email address for data protection queries is [info@pickledpantry.co.uk](mailto:info@pickledpantry.co.uk). If you would prefer to speak to us by phone, please call 020 8399 4694.