# Grove Park Deli Ltd. Privacy Policy

#### • Introduction

At Grove Park Deli we take your privacy seriously. We are committed to protecting the privacy of our clients and users of our website. This Privacy Policy states our policy and practices regarding the collection and use of your personal information. We will ensure that the information you give to us, or which we have collected is only used for the purposes set out in this Policy.

Through this Privacy Policy we aim to inform you about the types of personal data we collect, the purposes for which we use the data and the ways in which the data is handled. We also aim to satisfy the obligation of transparency under the EU General Data Protection Regulation 2016/679 ("**GDPR**") and national laws implementing GDPR.

For the purpose of this Privacy Policy the controller of personal data is Grove Park Deli Ltd

## • The Information we collect

The information we may need to collect will include names, addresses, email address, telephone numbers etc. Only essential information will be collected and only when a client requests a quote, information or services, this information will only be used in ways detailed in section 3. Any information collected is kept in the strictest confidence and is never sold or passed to any independent third parties without your express written permission.

# • How we use your Personal Information

We will only hold, use and disclose your personally identifiable information for our legitimate business purposes including:

- To provide our services to you eg, to process and fulfil orders.
- To maintain our business relationship, where you are a client.
- To deal with your enquiries and complaints.
- Where relevant, to meet legal, regulatory or compliance needs.
- To better understand your needs.
- To provide a better service.

From time to time, we may also use your information to contact you and provide you with marketing information we think would be of particular interest. At a minimum, we will always give you the choice to opt-out of receiving such direct marketing and will only send it once you have opted in to receive it.

We will not use or share the personally identifiable information provided to us in ways unrelated to the uses described in this statement. More information about how we may share your information can be found at section 5.

## • The Legal Basis for Processing your Personal Information

We will process your data on the basis of <u>legitimate interests</u> as we have concluded this is the most appropriate basis.

## Our <u>legitimate interest</u>s for customer orders are:

- In order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;
- We are subject to certain legal requirements which may require us to process your personal data.
- To fulfil customer orders as requested and required, we will need to collect certain data depending on the circumstances and execution of the order.

## Our <u>legitimate interest</u> for direct marketing is:

• To provide you with information about our goods, services and events, and to enhance our trading relationship. Offering the right to opt out at any time using our contact details provided below.

## • How we share your Personal Information

We may disclose your personally identifiable information with other parties. Details of those parties are set out below along with the reasons for sharing it.

#### **Third Parties**

When necessary we will need to share your personal information with trusted third parties where we have retained them to provide services that are relevant to Grove Park Deli's and our customers business relationship, and to process and fulfil orders. From such third parties we require regulation compliance standards of confidentiality and data protection.

# **Regulatory and Law Enforcement Agencies**

We may disclose your personal information if required by applicable law, regulation or as part of a legal process. If we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

#### New business owners.

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, we will notify clients of such an event.

# • How long we will hold your information

We will retain your personal information for the time necessary to provide the services we perform for you, or stated by the purposes outlined in this Privacy Policy, and you can always request that we stop processing or delete your personal information.

### • Your rights on Information we hold about you.

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

## **Right of Access**

You have the right at any time to ask us for a copy of the personal information about you that we hold. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

## **Right of Correction or Completion**

If any personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data rectified, updated or completed. You can let us know by <u>contacting us</u>.

# **Right of Erasure**

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed, or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

## Right to object to or restrict processing

In certain circumstances, you have the right to object to our processing of your personal information by <u>contacting us</u>. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

# **Right of Data Portability**

In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that you have provided to us previously and is processed by us using automated means. While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

You can exercise any of the above rights by contacting us using any of the methods in the <u>Contact</u> <u>section below</u>.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details in the <u>Contact section below</u>.

### • Information about Grove Park Deli's online visitors

We do not collect or store any personal information about our website users. Any information sent to us via our email link (messages, email addresses, telephone numbers, personal data etc.) is kept in the strictest confidence and is never passed on or sold to any independent third parties without your express written permission.

## • Use of Cookies

We do automatically track certain information about your behaviour while visiting our websites. We use this information in order to measure our website's performance and to improve its design and functionality. We only use the Cookies outlined below:

#### **Performance Cookies**

These cookies collect information about how you interact with our websites

For more information on our use of cookies please visit our Cookie Policy.

#### • Other Information

#### Security

We have put in place measures to ensure the security of the information we collect and store about you and will use our reasonable endeavours to protect your personal data from unauthorised disclosure and/or access including through the use of network and database security measures, but these cannot guarantee the security of any data which is collected and stored.

#### **Changes to our Privacy Policy.**

Our Privacy Policy is subject to change from time to time and, if we update it, we will post these changes on this page so that you will be aware of how we use your information.

#### **Contact Us**

If you have any enquires, if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us by any of the methods below. Depending on your request, we may ask you to verify your identity.

#### Email info@groveparkdeli.com

Grove Park Deli Ltd, 22 Fauconberg Rd, Chiswick, London, W4 5JY.

Telephone 020 8995 8219

Any complaints can also be made directly to the Information Commissioners Office.