



Celtic Foodservices Ltd

Privacy Statement 2018

UK

We are Celtic Foodservices Limited of Unit 4 London Road Industrial Estate, Pembroke Dock, Pembrokeshire, Wales. SA72 4RZ. We share your concern about the protection of your personal information and are committed to safeguarding your privacy.

We will be the “controller” of the personal information you provide to us or which we collect from you.

## 1. Personal Information that we collect

We collect a range of personal information relating to you, including your:

- Name
- Email address
- Telephone number
- Payment information
- Delivery and billing address
- Any other personal information that you choose to provide to us when you complete online contact forms, trade application forms or otherwise make contact with us.

## 2. How we use your personal information

We use your personal information as follows:

- To maintain our relationship with you whilst you are a customer
- To process and provide agreed goods and services to you.
- For invoicing, processing payments, account set up and maintenance.
- To communicate with you, including to respond to information requests/enquiries submitted and /or to obtain your feedback on our products and services.
- For record keeping, statistical analysis and internal reporting and research purposes.
- To ensure data security and to provide you with access to secure areas of our website.
- To notify you about changes to our products and services
- To decide and notify you about price changes
- To monitor the quality of our products and services
- For logistical purposes, including to plan and log delivery routes.
- To investigate any complaint you make
- To provide evidence in any dispute or anticipated dispute between you and us.
- To customise various aspects of our website to improve your experience.
- To obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes.

- To monitor and /or record telephone conversations to or from you to offer additional security, resolve complaints, improve our service standards and for staff training purposes.
- To protect the rights, property and safety of Celtic Foodservices Ltd, its personnel and others.
- Marketing We may send you direct marketing in relation to our own products and services by phone or/and post, as long as this is in line with any marketing preferences that you have provided to us. I.e where you have consented to this or where you have not objected or we are marketing similar products to those which we the subject or a previous sale or enquiry to you.

Your agreement to the use of your personal information for direct marketing purposes is optional and if you choose not to consent, the use of our website will not be affected. You can choose to opt out of receiving direct marketing information from us at anytime by either:

Email [info@celticfoodservices.co.uk](mailto:info@celticfoodservices.co.uk)

Or by mail to Unit 4 London Road Industrial Estate, Pembroke Dock. SA72 4RZ

By calling 01646 685869

- Recruitment- All applications will be asked to provide a CV , covering letter and relevant supporting documentation. Before you submit these, you will be provided with a privacy notice which provided specific information about how your personal information will be handled in connection with your application.

### 3. Automated decision mailing/profiling

- Credit Checks - We use technology provided by the credit reference agencies Experian and Dun & Bradstreet (“CRAs”) that process personal information that you provide to us, in order to analyse your credit worthiness, which helps us to decide if we are able to offer you an account, through which you can purchase goods from Celtic Foodservices Ltd, by phone, online or at our store. We will also continue to exchange information about you with the CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share this information with other organisations, which may use it to make decisions on future applications for credit.

Experian provides a Credit Reference Agency Information Notice (“CRAIN”) with further information about how it uses and shares personal information that it receives about you and/or your business. This can be found on their website [www.experian.co.uk](http://www.experian.co.uk)

Dun and Bradstreet also provide further information on their privacy policy on [www.dnb.co.uk](http://www.dnb.co.uk)

If you pass our credit checks and our other account opening criteria (details of which will be made available to you during the account opening process) you will be entitled to open an account with us and order our products in accordance with our General Conditions of Sale. If you do not pass our credit checks you will not be able to set up an account but you may still be entitled to order our products at our discretion, by making payment upfront.

- Pricing Variations - We use software that processes your personal information (including contact details) and information about your transaction history with us in order to produce recommendations for periodic variations in the pricing of our products. We use this software to help us decide how and when to change our prices. Our Sales Team ultimately decide if any price change recommendations produced by the software will be applied.

## 4. Legal basis for processing

In terms of the legal base we rely on to process your personal information, these are as follows:

- Where you have provided your consent for direct marketing communications in respect of our own products, including in respect of marketing communications sent by electronic means or post.
- For the performance of a contract with you (such as a contract for the provision of goods) or to take steps at your request prior to entering into this contract.
- To comply with legal obligations, including in relation to health and safety environmental legislation, performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigation or litigation.
- To protect your vital interests or the vital interests of another person eg where you or they are seriously injured or ill or

For our legitimate interests in:

- Management of your account (including processing payments) and our relationship with you
- Operating our website
- Sending direct marketing in respect of our own products where you have not provided your consent and the marketing communications is sent by no electronic means EG post or telephone, processing orders and supplying our products and
- Our internal business purposes which may include processing for the purposes of record keeping, research, reporting and statistics, data security to ensure the quality of our products and service, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing

payment performance data to credit agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel and protection of our rights, property and safety (and that of others)

You can object to processing carried out on the basis of our legitimate interests at any time by emailing [info@celticfoodservices.co.uk](mailto:info@celticfoodservices.co.uk).

## 5. How we share your personal information

When we use your personal information for the purposes specified above, we may share your information with:

- Third party providers who provide the following type of service to us: market research, warehousing and logistics, software, recruitment and customer relationship management.
- Third party providers in order for us to process payments that are due to us, in doing so we provide bank card details to such providers.
- Third party service providers and agents we appoint as our sales agents or to perform services on our behalf, who are provided with access to certain customer account details in order to process sales or provide services on our behalf.
- Licenced credit reference agencies, debt collection agencies and lawyers when we carry out credit checks to report on your payment performance and or seek to recover debts due to us.
- Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice.
- Emergency services in the event that we need to report accidents or incidents or request emergency assistance.
- Any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety or in order to protect the rights, property, or safety of Celtic Foodservices Ltd, its employees or others
- Investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to Celtic Foodservices Ltd.
- Any other third parties, if authorised by you to do so.

We ensure that, where your personal information is transferred to any country outside the European Economic Area that this is done using “model clauses” (standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area) or other specific legally-approved safeguards. You can request further details and/or a copy of the relevant safeguards.

The performance of services by our third party service providers may be subject to a separate privacy statement provided to you by the relevant third party. You should read any such statement carefully.

## 6. How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will take into account factors including:

- Legal obligations under applicable law to retain data for certain period of time.
- Statute of Limitations under applicable laws, disputes and
- Guidelines issued by relevant data protection authorities

Otherwise we securely erase your information once this is no longer needed.

## 7. Cookies

Where you use our website, we will process your personal information collected using cookies in accordance with our cookie policy.

## 8. Links to third party websites

Our website may contain links to other internet websites. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such websites, including such sites use of any personal information. Nevertheless, in the event you counter any third party associated with our websites (or who claims association with our websites) who you feel is improperly collecting or using information about you, please contact [info@celticfoodservices.co.uk](mailto:info@celticfoodservices.co.uk) and we will be happy to forward your message to the third party. If we sponsor promotions or third parties sponsor promotions in conjunction with our websites, either we or the third party will post relevant privacy information in the official rules and /or regulations area for the promotion. That privacy information, to the extent (if any) it conflicts with this privacy statement will govern that particular promotion.

## 9. Security

We use reasonable security methods to protect the personal information that we process. To check if you are in a secure area of the website, please look for the closed padlock on your browser. Please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the internet.

## 10. Your Rights

The following sections explain your rights. The various rights are not absolute and each is subjective to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

- The right to be informed – you have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we are providing you with the information in the Privacy Statement.
- The right of access – You have the right to obtain a copy of your personal information (if we are processing it) and other certain information (similar to that provided in this Privacy Statement) about how it is used. This is so you are aware and can check that we are using your personal information in accordance with data protection law. We can refuse to provide information where to do so may reveal personal information about another person or would negatively impact another person's rights.
- The right to rectification – You can ask us to take reasonable measures to correct your personal information if it is inaccurate or incomplete.
- The right to erasure – this is also known as “the right to be forgotten” and in simple terms, enables you to request the deletion or removal of your personal information where there is no compelling reason for us to keep it or its use is unlawful. This is not a general right to erasure, there are exceptions e.g. where we need to sue the information in defence of a legal claim
- The right to restrict processing – you have the right to “block” or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information but may not use it further. We keep lists of people who have asked for further use of their personal information to be “blocked” to make sure the restriction is repeated in future.

- The right to data portability – you have rights to obtain and re-use certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT system and theirs (or direct to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us and we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means
- The right to object – you have the right to object to certain types of processing, on grounds relating to your particular situation, at any time in so far as that processing takes place for the purposes of legitimate interests pursued by Celtic Food Services Ltd. We will be allowed to continue to process the personal information if we can demonstrate “compelling legitimate grounds for the processing which override (your) interests, rights and freedoms” or we need this for the establishment, exercise or defence of legal claims.
- Rights in relation to automated decision making and profiling – you have the right not to be subject to a decision based solely on automated processing which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

## 11 Updating this Statement

We review our privacy practices from time to time. We ask that you periodically review this page for updates to our Privacy Statement. We reserve the right to modify this policy.

## 12 Contact us

For further information regarding these rights, about this Privacy Statement generally or make a complaint please contact us at [info@celticfoodservices.co.uk](mailto:info@celticfoodservices.co.uk) or call 01646 685869. Please provide as much information as possible to help us identify the action you are wanting us to take and why you believe this action should be taken. We will generally respond within 14 days but this can be extended if the situation requires it.

If after contacting Celtic Foodservices Ltd you are still unhappy , you may complain to the Information Commissioner whose details can be found at [www.ico.org.uk](http://www.ico.org.uk)