

## **Beechdean Privacy Policy**

### **Introduction**

This Privacy Policy explains in detail how we collect, use and store the personal data you provide us when using our website and interact with us. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

Beechdean Dairies Ltd is the "data controller" for the purposes of data protection law. We are committed to ensuring your privacy is protected and we want to fully inform you on how your data is used.

We may update and change this Privacy Policy from time to time and we advise that you regularly check this page to ensure you are happy with the changes; we will however notify you of any significant changes.

### **Lawful reasons to using your personal data**

There a number of reasons we may collect and use your personal data which the law on data protection allows us to, including:

- **Consent**  
We will always request your consent when we collect and process your personal data  
*For example if you were to sign up to receive future newsletters, you would need to tick the opt-in box*
- **Contractual obligations**  
In order for us to fulfil our contractual obligations to you we will need to use your personal data  
*For example for us to deliver a product to you we will need your personal data including name and address*
- **Legal or regulatory obligation**  
*For example we will need to pass and process your personal data to law enforcement if there is any involvement in fraud or criminal activity*
- **Legitimate Interests**  
Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.  
*For example we may send you promotional offers based on your past purchase history*

### **What personal data do we collect?**

We may collect the following information about you:

- Personal data including name, job title and company name

- Contact data including email address, telephone number, postal address and postcode
- IP addresses
- Information gathered by the use of cookies in your web browser, see section on how we use your cookies.
- If you connect, comment or provide feedback on our social media channels including Facebook, Twitter and Instagram we will see your username

### **How do we collect your personal data?**

We use a number of methods to collect data from you and about you including:

- New account customer forms
- Product enquiries via the website, on email or by phone
- Visiting us at an exhibition or show or exchanging business cards
- Engaging with us on social media
- Purchasing a product from us
- When you have given a third party permission to share with us the information they hold for you, for example an authorised Beechdean salesperson has requested a direct shipment to you as a customer of that dealer

### **How and why do we use your personal data?**

At the time of providing personal data we will advise you why we are collecting it and how it will be used. At any time you can change how you wish us to use your data.

How and why we use your data include:

- To set you up as a new customer and commence trading
- To deliver or service products to you

*For example we use third party carriers to deliver our products to you, in which case we will need to provide them your details including name, address and contact details. We also use third party service contractors to carry out service & maintenance work on freezers; again we will need to pass on your details to arrange a visit.*

*If we cannot pass on your details then we cannot fulfil our contractual obligations to you.*

- To respond to any product enquiries or issues

*For example you may get in contact by phone, email or website. In order for us to find out details of the issue and help identify the solution we will need to follow up by contacting you directly. We may also pass your details internally within Beechdean to ensure the correct person can deal with your enquiry.*

- To send you communication via email, newsletters and other important business information

Please note that if there is a legitimate business reason for us to communicate with you and to ensure we can fulfil our business contract with you we may send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, price changes, corporate updates, amendments to our Terms & Conditions and legally required information relating to your orders. These Essential Business Information emails will not include any promotional content and do not require prior

consent when sent by email. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

- To follow up any comments or queries that you have left on one of our social media channels

*For example if you show an interest in a product that we have promoted on one of our social media channels, we will pass your details to one of our Beechdean sales representatives to follow up and provide more details to you*

- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

*We want to provide our customers with relevant information about products that are of interest whilst providing great customer service. We will monitor which web pages are most visited and build our marketing strategy around this*

If you fail to provide Personal Data that we have requested either under the terms of contract with you or required by law, we may not be able to perform the contract we have or are trying to enter with you, for example provide you with products or services. In this case, we would notify you that we may have to cancel a product or service you have with us.

### **Protecting your personal data**

Beechdean has a number of GDPR compliant processes and procedures as follows:

- The relevant Beechdean employees have received training in GDPR and how to handle your personal data
- Access to your personal data is restricted to the relevant employees/departments that are required to process your data
- Where hard copies are created, these are securely kept.
- According to each business unit's process and procedure, your personal data will be periodically reviewed and securely deleted if required
- All personal information is transferred by secure email to secure servers on site to which only access is granted to key personnel.

### **Cookies and similar technologies**

These are small files that are widely used in order to make websites work more efficiently. Most web browsers allow some control of cookies through browser settings. To find out more about cookies, including how to manage or delete them from your computer and how to see what cookies have been set, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can also set your browser to refuse some or all browser cookies, or to alert you when websites access or set cookies. If you disable or refuse cookies, please note that some parts of the Beechdean website may become inaccessible or not function properly.

On this website, we use:

Cookie name	Life span	Purpose
svSession	Persistent	Identifies unique visitors and tracks a visitor's sessions on a site
hs	Session	Security
XSRF-TOKEN	Session	Security
smSession	Persistent (Two weeks)	Identifies logged in site members
TSxxxxxxx (where x is replaced with a random series of numbers and letters)	Session	Security
TSxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Session	Security
RequestID	Session	Track visitor behavior and measure site performance
Google Analytics	Persistent	Third Party Performance Cookie / Analytical Technology

#### How long will we keep your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes in which we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

*For example details of orders and invoices are kept for 6 years in order for us to comply with our legal and contractual obligations.*

In some circumstances, we may anonymise your personal data, which means it can no longer be associated with you, for research or statistical purposes.

*For example when you visit an exhibition we will keep your details for a limited time, after which we will then only keep details of the amount of visitors we had by region or market size of business.*

#### Who will we share your personal data with?

We will sometimes need to share your personal data with our trusted third parties, these can include:

- Delivery couriers including, but not limited to, TNT and pallet carriers
- Service engineers
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances
- Trade Associations such as the British Retail Consortium.

#### Your legal rights over your personal data

You have the rights under the data protection laws in relation to your personal data including:

- **Request access to your personal data** (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or out of date data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no Business or legal reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a Legitimate Interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Please email us on [privacy@beechdean.co.uk](mailto:privacy@beechdean.co.uk) requesting a Data Subject Access Request if you wish to exercise any of these rights.

- No fee in most cases – You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. There is the possibility that we will refuse to comply with your request in these circumstances.
- What we may need from you – to protect your personal data we will ask you to verify your identity before proceeding with your request to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. If you have authorised a third party to submit a request on your behalf, we will request proof that they have your permission to do so.

- Time limit to respond - We will respond to all legitimate requests within 1 month from the date of receipt of your request. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Where you are sending us a request via post rather than email we recommend you send it via recorded delivery to guarantee safe delivery.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Privacy Officer**:

Email: [privacy@beechdean.co.uk](mailto:privacy@beechdean.co.uk)

Telephone: 01494 563980