



Unit 12 Garrick Road Industrial Estate,
Irving Way, London, NW9 6AQ
020 8457 2080
www.breadltd.co.uk

The Bread Factory Privacy Policy

Introduction

IMPORTANT: PLEASE READ THIS PRIVACY POLICY AS IT APPLIES TO ANY PERSONAL DATA YOU PROVIDE US OR WE COLLECT ABOUT YOU, FOR EXAMPLE IF YOU ACCESS THE WEBSITE AT BREADLTD.CO.UK OR ANY OTHER WEBSITE OWNED, OPERATED OR PROVIDED BY THE BREAD FACTORY INCORPORATED IN ENGLAND, COMPANY # 927554009, REGISTERED OFFICE UNIT 12 GARRICK ROAD INDUSTRIAL ESTATE, IRVING WAY, HENDON, LONDON, NW9 6AQ ('WEBSITE' AND 'THE BREAD FACTORY, 'US', 'WE' RESPECTIVELY) OR ENQUIRE ABOUT ANY OF OUR PRODUCTS OR SERVICES / USE ANY OF OUR PRODUCTS OR SERVICES ('SERVICES').

THIS POLICY

This Policy sets out what personal data we might collect, how we process and protect that data, the lawful grounds for that processing, and your related rights.

We use 'GDPR' to refer to either the EU or UK version as they're almost identical. The GDPR is the world-standard for data protection laws, inspiring legal developments around the world.

'Personal data' is a defined term in EU and UK law. We also use it here to cover 'personally identifiable information' as defined in US law, and other similar legal definitions. Essentially 'personal data' means any information relating to an identified or identifiable natural person, namely one who can be identified, directly or indirectly from that information alone or in conjunction with other information.

In most cases, the lawful ground (or legal basis) for our processing will be that the processing is necessary: (i) for our legitimate interests in carrying out our business, including to improve and market our products and services, provided those interests are not outweighed by your rights and interests ('Legitimate Interests'), (ii) to perform a contract with you ('Contract'), or (iii) to comply with our legal obligations ('Legal Obligation'). Where processing is based on your consent ('Consent'), we'll identify the processing purposes and provide you with relevant information to make the processing fair and transparent when we ask for your consent.

As data protection law and practice are constantly developing, we'll need to update this policy from time to time, which we'll do by posting a new policy on the Website that takes effect from the date stated. It is your responsibility to return to the Website from time to time and check for changes.



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HOW DO WE OBTAIN PERSONAL DATA?

We collect or are provided personal data in the normal course of business. For example:

- you may provide us with your details when you become a customer, such as your name, email, and employer (when purchasing on behalf of a business) ('Account Data'),
- we may receive personal data from our customers when using our Services, such as names of team members or data entered into the Services ('Service Data'),
- you may provide us with your details when you ask about buying our products or services (through the Website, by email or otherwise) and we may otherwise lawfully obtain contact details of potential customers for our Services for our marketing purposes, for example from publicly available business contact information or your business website ('Marketing Data'),
- when you visit the Website we may collect information about your visit such as your IP address and the pages you visited and when you use our Services we may collect information on how you use those Services ('Improvement Data'), and
- you may provide us with your CV and other personal data when you apply for a position ('Recruitment Data').
- In 'GDPR-speak', we are the 'controller' of Account, Marketing, Improvement and Recruitment Data as we determine the purposes (the 'why') and the essential means (the 'how') of the collection and processing. We are the 'processor' of Service Data as the customer remains the 'controller' of Service Data and we only process Service Data to fulfil our contract with the customer and on their instructions.

YOUR PROVISION OF PERSONAL DATA

When you provide us with personal data about yourself or another person, for example a colleague or a contact, you are confirming to us that you have their consent or are otherwise authorised to provide us with that information and that any personal data you give us is accurate and up to date.

Provision of personal data to us is never a requirement, however if you do not provide us with the personal data necessary for us to carry out an action at your request or under a contract with or relating to you, for example to respond to your query or provide Services to you, we may not be able to respond to your query or provide Services to you.



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SPECIAL CATEGORIES & CRIME

Given the nature of our business, we do not ask for 'special categories of personal data' such as information about your political opinions, racial origins or sexual life, or personal data relating to criminal convictions and offences – and we would ask you not to send any to us or upload any into the Services.

We may ask you to provide information that would imply a health condition when asking for details of any known allergies or intolerances.

However, if at any time you choose to transmit such personal data over our Website or Services for any reason, or you provide us such personal data to us as part of Recruitment Data, you must have full authority or consent to do so and you agree that it will be dealt with according to this Privacy Policy, including possible transfer to our offices or the third parties, inside or outside the UK or EEA, as described in this policy.

HOW DO WE USE PERSONAL DATA?

We use personal data in the normal course of our business, including to provide, secure, manage and improve our Services and to meet any binding contractual or legal obligations. This includes:

- to respond to enquiries about the Services, to provide the Websites, Services, to provide advice and support. Lawful basis: Legitimate Interests or Contract.
- to analyse and improve the Website, for example for technical or security purposes and to improve the customer experience. Lawful basis: Legitimate Interests, however where for example applicable law requires your consent to use certain cookies, we will ask for your Consent having provided you with relevant information.
- to market our Services – if we do so, we will provide you with an easy and free way to opt-out of receiving such communications in the future. Lawful basis: Legitimate Interests (or Consent as above).
- in certain circumstances, to share it with a limited number of third parties as described in this policy, for example for operational requirements and business continuity purposes. Lawful basis: most processing will be based on Legitimate Interests, some processing is based on Contract and, where necessary (as above) some processing may be based on your prior Consent.
- to manage our recruitment activities, including that the Recruitment Data will only be reviewed by those with a need to know as part of that recruitment, and that it may be stored with our cloud storage or cloud HR service providers.



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SHARING DATA & INTERNATIONAL TRANSFERS

We will not give, sell or rent your personal data to third parties so they can market their services to you. Nor do we accept advertising from third parties on the Website. We may share personal data in the following limited circumstances.

For provision of the Services, and for our own disaster recovery and business continuity purposes, we may store or transmit personal data to or through third party providers, such as with our contractors and advisors to help us operate, secure and analyse our business. Lawful basis: Legitimate Interests or Contract.

We may be obliged to disclose your personal data to comply with a law, order or request of a court, government authority, other competent legal or regulatory authority or any applicable code of practice or guideline. Lawful basis: Legal Obligation.

If we enter negotiations with a third party for the sale or purchase of all or part of our business, we will only disclose personal data to that third party to the extent it relates to that business and only under conditions of confidentiality requiring the third party to be bound by the privacy policy that applies to that data. Lawful basis: Legitimate Interests.

In each case, we share the minimum personal data necessary and we have written contracts in place incorporating relevant wording to safeguard that personal data and comply with applicable laws, and we will only share such data as is necessary for the purpose in question. Our starting position is always to keep personal data within the UK or European Economic Area ('EEA') where the UK GDPR or EU GDPR applies respectively. However, in order to carry out the above purposes, we may use third parties and their facilities outside the EEA. In all such cases we will ensure that appropriate security measures are in place to protect your personal data and a valid legal basis for the transfer applies.

COOKIES

Our website uses cookies and/or similar technologies. Please review our Cookie Policy for more information, including on how to refuse or selectively accept cookies and/or similar technologies.

RETENTION

As a default position, we will only retain personal data for any statutory retention period, then a reasonable period (if any) necessary for the above purposes. This is subject, for example, to any valid opt-out or withdrawal of consent where processing is based on consent, or other valid exercise of your data subject rights.



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SECURITY

The security of data is very important to our business. In accordance with our legal obligations, we take appropriate technical and organisational measures to protect your personal data and keep those measures under review. However, we can only be responsible for systems that we control and we would note that the internet itself is not inherently a secure environment.

ANONYMISED DATA

We may create anonymised data from personal data, and any anonymisation would be carried out in accordance with applicable law as well as relevant guidelines from regulators such as the UK Information Commissioner ('UK ICO'). Anonymisation may, for example, be achieved by aggregating data to the point that no individual can be identified such as aggregating website use statistics to see which web content is working well and which could be improved. Anonymised data does not allow for the identification of any individual person and, as it is no longer personal data, neither data protection laws nor this Privacy Policy would apply to such data.

THIRD PARTY SERVICES

If you access the services of another provider through our websites or services, for example through a link on the Website or affiliate, your use of those services is entirely at your risk and governed by the terms and privacy policy of that third party provider. If we resell a service delivered or provided by a third party ('Third Party Service'), including any software that is delivered or owned by a third party ('Third Party Software'), it is that third party's separate privacy policy that will apply to your personal data and your use of the Third Party Service and Third Party Software. Your use of a Third Party Service is not covered by this Privacy Policy. Please therefore review the privacy policy for any Third Party Service and Third Party Software before using it.

YOUR RIGHTS

Under the UK and EU GDPRs, you have the following rights (some of which may be subject to conditions set out in the relevant GDPR):

- to know if we process any personal data about you and, if we do, with certain limitations, to a copy of that personal data,
- to ask us to remove or correct any of that personal data that is inaccurate,
- to object to certain processing,
- to withdraw any consent you may have given us for any processing of your personal data,
- to ask us to restrict processing certain of your personal data,



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- to ask us to erase your personal data, and
- to 'port' certain of your personal data to you or another provider, provided in each case that we have such data and certain conditions are met.

You have the right, at any time, to object to the processing of your personal data for direct marketing.

CONTACT US

If you've any question you can always contact us at the address above or by email to dpo@breadltd.co.uk. You have the right, at all times, to notify a complaint to any regulator such as the UK Information Commissioner. We always welcome the opportunity to discuss and resolve any complaint with you first.

The Bread Factory