

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 1 of 9

*IT Governance are experienced data protection practitioners and all document templates are provided as general guidance. Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and IT Governance accepts no liability of any sort arising from the use of these templates.*

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to EFG Foodservice collecting/processing their personal data.
- 2.2 All Employees/Staff of EFG Foodservice who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

EFG Foodservice is the trading name of Essex Flour and Grain. The company comprises our offices and warehouses based at 28-30 Lee Conservancy Road, Hackney, London, E9 5HW and 5 Ashfield Trading Estate, Royston Road, Baldock, Herts, SG7 6NN. EFG Foodservice is a food wholesaler and distributor selling ambient, chilled, frozen food and related non-food goods to customers including but not limited to, schools, colleges, hospitals, offices, care homes, bakeries, restaurants, cafes, coffee shops, hotels, and hostels.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- ([Fiona.Spinks@efgfoodservice.co.uk](mailto:Fiona.Spinks@efgfoodservice.co.uk))
- (020 8985 9000)

The personal data we would like to collect from you is:

EFG Foodservice

Classification\_3



# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 2 of 9

<b>Personal data type:</b>	<b>Source</b> (where EFG Foodservice obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Your contact details and contact details of people associated with your account (such as name, telephone number, address, work address, e-mail address etc)	Complete forms we provide for you, verbal and e-mail communication, purchasing of products, submitting information via our websites or apps, enter our competitions or promotions, make a complaint, make a claim.
Marketing preferences	Submitting information via our websites or apps, complete forms we provide for you, verbal and e-mail communication, online ordering system
Audio and video recordings, webchat records, and contemporaneous notes	Recorded phone calls, CCTV on site, records of site visits
Financial information	Publicly recorded accounts information (Companies house), credit searches, , credit references
Transaction and payment information- bank account details you provide. If you pay somebody else's bill then that information will also be linked	Complete forms we provide for you, verbal and e-mail communication, purchasing of products, submitting information via our websites or apps, enter our competitions or promotions
Purchase and account history	Phone calls, e-mails, submitting information via our websites or apps
How you use mobile applications and websites	Submitting information via our websites or apps
Exercising your rights- If you exercise any of your statutory rights up data protection law we will keep a record of this, and how we respond	Verbal and e-mail communication, submitting information via our websites or apps

The personal data we collect will be used for the following purposes:

- Provide our services to you and maintain your account
- Take payment for our products and services, and debt collection
- Deliver products to you, and keep you informed about the process of delivering orders (e.g. notifying you if your delivery is late, clarifying issues with orders, etc.)
- Perform credit checks
- To deliver service communications (such as bills), and tailoring those communications

EFG Foodservice

Classification\_3



---

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 3 of 9

---

- Answer your complaints and questions
- Marketing to you our products and services
- Dealing with complaints
- To pay wages to our staff, and pass information to pension provider and HMRC, Department of Work and Pensions etc
- To contact our staff's nominated emergency contacts regarding their safety
- To carry out usual HR and accounting procedures

Our legal basis for processing for the personal data:

- Consensual agreement as stated in clause 4.1, Privacy Procedure
- Contractual obligations as stated in clause 4.2, Privacy Procedure
- Legal obligations as stated in clause 4.3, Privacy Procedure

Any legitimate interests pursued by us, or third parties we use, are as follows:

- The management, and categorisation of customer and employee data and information in order to efficiently perform the functions of our role as wholesaler and distributor
- The management of reward schemes that the data subject has already agreed to
- Maintain and improve our products and services, e.g. optimise business processes, quality assurance purposes, support efficient management of our staff, analyse performance of webpages and provide relevant content to you
- Develop new products and services
- Assess which of our products and services that may be of interest to you, e.g. To understand regional demographics and take up, tailor offers and recommendations to customers' needs and reward loyal customers
- Direct marketing. If you have not specifically consented to receive direct marketing, we will only send you direct marketing materials where we are allowed to because of law. However we will never send you direct marketing where you have opted out of receiving direct marketing communications
- For market research purposes, e.g. to understand how you use our products and services or how we might improve them
- Management information reporting
- Protection of our staff
- Staff training
- For the establishment, exercise or defence of legal claims
- Maintain accuracy and relevance of your data

The special categories of personal data concerned are:

- Health data of our staff (eg known ailments) for the purpose of Health and Safety

## 3.2 Consent

EFG Foodservice

*Classification\_3*



---

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 4 of 9

---

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for EFG Foodservice to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by request

### 3.3 Disclosure

The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

- Business Computer Projects Ltd (BCP)- Management system
- PDQ Computers Ltd- Technical support
- Vaswani associates- Accountancy
- Barnes Roffe- Accountancy
- Country Range Group- anonymised
- Sales-I- Sales analytics
- TimeTastic- Staff holiday information
- Fleetmatics- Driver routing system
- FTA- Driver tachograph analysis
- AP Partnership- Legal advice
- Sage- Accounting software
- Credit and anti-fraud reference agencies
- Third party data and insight providers
- The government, ombudsman services, and regulators
- Advertising partners
- Delivery companies for specific customer's courier deliveries- TNT, Baldwins

The following third parties will receive personal data for our staff for the following purpose(s) as part of the processing activities:

- Business Computer Projects Ltd (BCP)- Management system
- PDQ Computers Ltd- Technical support
- Vaswani associates- Accountancy
- Barnes Roffe- Accountancy
- Country Range Group
- Sales-I- Sales analytics
- TimeTastic- Staff holiday information
- Fleetmatics- Driver routing system
- FTA- Driver tachograph analysis
- AP Partnership- Legal advice

EFG Foodservice

*Classification\_3*



- Sage- Accounting software

### 3.4 Retention period

EFG Foodservice will process personal data for the length of consent and will store the personal data to match our legal requirements eg staff information will be held for 7 years following the end of employment as per legal requirements ([GDPR DOC 2.3](#) Retention Period Procedure).

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that EFG Foodservice refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by EFG Foodservice (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and EFG Foodservice's data protection representatives Data Protection Officer / GDPR Owner.

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 6 of 9

The details for each of these contacts are:

	<b>Data Protection Officer (DPO) contact details</b>
Contact Name:	Fiona Spinks
Address line 1:	EFG Foodservice
Address line 2:	28-30 Lee Conservancy Road
Address line 3:	Hackney
Address line 4:	London
Address line 5:	E9 5HW
Email:	
Telephone:	020 8985 9000

### 3.7 Privacy statement

Read more about how and why we use your data here [www.efgfoodservice.co.uk](http://www.efgfoodservice.co.uk)

## 4. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### How we use your information

This privacy notice tells you how we, EFG Foodservice, will collect and use your personal data for, for example: cookies, profiling, complaints, subscriptions, etc.

EFG Foodservice

Classification\_3



## Why does EFG Foodservice need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data to enable us to carry out the functions of a delivery wholesaler. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes EFG Foodservice would contact you for additional consent.

## Will EFG Foodservice share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to EFG Foodservice in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with EFG Foodservice's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## How will EFG Foodservice use the personal data it collects about me?

EFG Foodservice will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. EFG Foodservice is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Under what circumstances will EFG Foodservice contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Can I find out the personal data that the organisation holds about me?

EFG Foodservice at your request, can confirm what information we hold about you and how it is processed. If EFG Foodservice does hold personal data about you, you can request the following information:

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 8 of 9

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of EFG Foodservice or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

EFG Foodservice accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

### Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Fiona Spinks
Address line 1:	EFG Foodservice

EFG Foodservice

Classification\_3





# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

Issue No:

Issue Date:

Page: 9 of 9

Address line 2:	28-30 Lee Conservancy Road
Address line 3:	Hackney
Address line 4:	London
Address line 5:	E9 5HW
Email:	
Telephone:	020 8985 9000

### Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the shared drive.

Signature:

Date:

### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Tim Spinks	28/06/2018

EFG Foodservice

Classification\_3



Customisable RECORD template v2.0  
Comments to [feedback@itgovernance.co.uk](mailto:feedback@itgovernance.co.uk)  
© IT Governance Ltd 2017  
[www.itgovernancepublishing.co.uk](http://www.itgovernancepublishing.co.uk)