

# Lynn's Country Foods Group

## Vendor Privacy Notice

Welcome to the Lynn's Country Foods Group Vendor Privacy Notice.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (EEA).

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Lynn's Country Foods Limited together with group companies The Finnebrogue Bacon Company Limited and Finnebrogue Vegetarian Company Limited, trading as Finnebrogue (" <b>the Lynn's Country Foods Group</b> ")
Our data protection officer	<a href="mailto:dpm@finnebrogue.com">dpm@finnebrogue.com</a>
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	<p>Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership</p> <p>Genetic data</p> <p>Biometric data (where used for identification purposes)</p> <p>Data concerning health, sex life or sexual orientation</p>
Data subject	The individual who the personal data relates to

## **Personal data we collect about you**

The personal data we collect about you depends on the particular products and services we provide to you. We will collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and business details;
- information to check and verify your identity, e.g. your date of birth;
- your gender;
- location data;
- billing information, transaction and payment card information;
- information to enable us to undertake credit or other financial checks on your business;
- information about how you use our website, IT, communication and other systems including your IP address;
- promotional photographs or video recordings;
- health and safety information for purposes of on-site visits;
- health information (including dietary requirements, allergies and health conditions) for purposes of on-site visits;
- your feedback and responses to surveys, competitions and promotions;
- information relating to your marketing preferences.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

## **How your personal data is collected**

We collect most of this personal data directly from you — in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry.
- directly from a third party, e.g.:
  - sanctions screening providers;
  - credit reference agencies;
  - customer due diligence providers;
  - other Vendors
- from a third party with your consent, e.g. your bank or building society

- from cookies on our website—for more information on our use of cookies, please see our cookie policy on our website
- via our IT systems, e.g.:
  - from door entry systems and reception logs;
  - through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

### How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

<b>What we use your personal data for</b>	<b>Our reasons</b>
Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our Vendors and verify their identity  Screening for financial and other sanctions or embargoes  Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety law or rules issued by our professional regulator	Depending on the circumstances:  —to comply with our legal and regulatory obligations  —for our legitimate interests
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances:  —to comply with our legal and regulatory

What we use your personal data for	Our reasons
	<p>obligations;</p> <p>—in other cases, for our legitimate interests, ie to protect our business, interests and rights</p>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>Depending on the circumstances:</p> <p>—for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information;</p> <p>—to comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, eg in relation to eg our financial performance, customer base, product range or other efficiency measures and Vendors	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	<p>Depending on the circumstances:</p> <p>—for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us;</p> <p>—to comply with our legal and regulatory obligations</p>
Protecting the security of systems and data used to provide the goods and services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>

What we use your personal data for	Our reasons
Updating and enhancing Vendors records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>—to perform our contract with you or to take steps at your request before entering into a contract;</li> <li>—to comply with our legal and regulatory obligations;</li> <li>—for our legitimate interests, e.g. making sure that we can keep in touch with our Vendors about existing orders and new products</li> </ul>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>—to comply with our legal and regulatory obligations;</li> <li>—for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</li> </ul>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>—existing and former Vendors;</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests, i.e. to promote our business to existing and former Vendors
Credit reference checks via external credit reference agencies	For our legitimate interests, i.e. to ensure our Vendors are likely to be able to pay for our products and services
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>—for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards;</li> <li>—to comply with our legal and regulatory obligations</li> </ul>
To share your personal data with members of our group and third parties that will or may take	Depending on the circumstances:

What we use your personal data for	Our reasons
<p>control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>—to comply with our legal and regulatory obligations;</p> <p>—in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets</p>

### How and why we use your personal data—Special category personal data

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law:

- data concerning health i.e. allergies, dietary information.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

### How and why we use your personal data—sharing

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

### Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our products and service, including exclusive offers, promotions or new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You do, however, have the right to opt out of receiving marketing communications at any time by:

- contacting us at [dpm@finnebrogue.com](mailto:dpm@finnebrogue.com);
- using the 'unsubscribe' link in emails or 'STOP' number in texts.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside the Lynn's Country Foods group for marketing purposes.

### **Who we share your personal data with**

We routinely share personal data with:

- companies within the Lynn's Country Foods group
- third parties we use to help deliver our products and services to you, e.g. payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our banks.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- Our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

## Where your personal data is held

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: **Who we share your personal data with**).

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: **Transferring your personal data out of the UK and EEA**.

## How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used.

Different retention periods apply for different types of personal data. Further details on this are available in our Retention Policy.

If you no longer have an account with us or we are no longer providing goods or services to you, we will usually delete or anonymise your account data after *seven* years.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

## Transferring your personal data out of the UK and EEA

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an **'adequacy regulation'**) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an **'adequacy decision'**) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#).
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK or EEA, we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR and/or EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not



transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on ‘**Changes to this privacy policy**’ below.

### **Transferring your personal data out of the UK and EEA—further information**

If you would like further information about data transferred outside the UK/EEA, please contact our Data Protection Manager (see ‘**How to contact us**’ below).

### **Your rights**

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal data being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning

	you or similarly significantly affects you
The right to withdraw consent	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consent by contacting the DPM.</p> <p>Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- provide enough information to identify yourself eg your full name, address and Vendors or matter reference number and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being lost accidentally or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator).

### **Changes to this privacy policy**

This privacy notice was last updated on 3 October 2024.

We may change this privacy notice from time to time—when we do we will inform you via *our website*.

### **Updating your personal data**

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address—see below ‘**How to contact us**’.

### **How to contact us**

You can contact us and/or our Data Protection Manager by email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details	Our Data Protection Manager's contact details
Lynn's Country Foods Group  Down Business Park, 46 Belfast Road, Downpatrick, County Down, BT30 9UP.  Telephone number: 02844619300	dpm@finnebrogue.com