



Data Protection and Privacy Policy

This website is owned by Karro Food Group Limited (company number: 08312502) whose registered office is at Norton Grove Industrial Estate, Hugden Way, Malton, North Yorkshire, YO17 9HG, United Kingdom and is operated on behalf of its subsidiary and wider group companies:

- Karro Food Limited (company number: SC220000);
- Karro Food Frozen Limited (company number: 9146568);
- Karro McGee ROI Limited (company number: 495211);
- Karro Food Stoke Limited (company number: 9147022);
- Karro Food US, LLC (a Delaware corporation);
- FJG Logistics Limited (company number: 06452479); and
- T S Bloor & Sons Ltd (company number 02329527)

(together referred to throughout this Privacy Policy as **we**, **our** or **us**).

We are committed to protecting and respecting your privacy. We are the data controller (i.e. the company who is responsible for, and controls the processing of, your personal data) with registration number ZA240366. We will let you know which entity will be the controller for your data when you place an order for a product or service with us.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

If you are an employee of ours (or a prospective employee engaging in our recruitment process), please also refer to the separate '**Karro Food Group Employee Privacy Notice**' (published on the intranet and available from HR) which covers the use of personal data collected as a result of your employment with us (or the recruitment process).

How we may use and will protect your personal data:

1. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

2. Information we may collect from you

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you contact us through the website by using our 'Contact Us' form or by voluntarily providing your information by post or telephone, we process the following kinds of personal data about you: first name, last name, email address, postal address and telephone number.

When you use our website, we process the following information about you: internet protocol (IP) address (this is an assigned number, similar to a telephone number that identifies your computer on a network), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We may also collect data that includes information about how you use our website.

We also collect, use and share 'Aggregated Data' such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate the information we collect about how you use our website to calculate the percentage of users accessing a specific part of our website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any 'Special Categories of Personal Data' about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the products or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your personal data by filling in the 'Contact Us' form on our website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - a) enquire about sales;
 - b) enquire about our products;
 - c) would like to know more about our farms; or
 - d) contact us for any other reason.

- **Automated technologies or interactions:** As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our section on [Cookies](#) for further details.
- **Third parties or publicly available sources:** We may receive personal data about you from analytics providers such as Google based outside the EU.

Informing us of changes: It is important that the personal data we hold about you is accurate and current. Please keep us informed and [contact us](#) if your personal data changes during your relationship with us.

Information about other people: If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can give consent on his/her behalf to the processing of his or her personal data and receive on his/her behalf any data protection notices.

Monitoring: We monitor emails for the purpose of quality assurance, training, fraud prevention and compliance.

3. Purposes for which we may use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) First name, last name, email address, organisations details, postal address and telephone number.	Performance of a contract with you
To register you as a new supplier or business partner	(a) First name, last name, email address, organisations details, postal	Performance of a contract with you

	address and telephone number.	
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) First name, last name, email address, organisations details, postal address and telephone number. (b) bank account and payment card details	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Notifying about any changes to products you have ordered / delivery updates (c) Asking you to leave feedback about our products or services	(a) First name, last name, email address, postal address and telephone number.	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to review feedback about our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) First name, last name, email address, organisations details, postal address and telephone number. (b) internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions,	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

	operating system and platform	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business)
To carry out credit checks (if you are a customer). We will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at http://www.experian.co.uk/crain/index.html	(a) First name, last name, email address, organisations details, postal address and telephone number.	Necessary for our legitimate interests (to enable us to make informed decisions about our business relationships).
To pass suppliers' details to supermarket customers (and companies that deal with traceability) for the purpose of maintaining supply chain visibility and ensuring the provenance and traceability of food products and compliance with legislation	(a) First name, last name, email address, organisations details, postal address and telephone number.	(a) Performance of a contract with you and other customers (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to allow us to do business)

		with supermarket customers)
--	--	------------------------------

Information we receive from other sources: We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Disclosure of your personal data

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006 (**Group**) in the EEA and USA.

We may share your information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our website;
- service providers acting as processors based in the EU, USA, Canada, Philippines, India, Israel who provide IT and system administration services;
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK and the USA who provide consultancy, banking, legal, insurance and accounting services; and
- 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.

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. **Cookies**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website.

We use cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer and/or device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer and/or device.

Cookies are small files saved to your computer's hard drive that track, save and store information about your interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience.

No cookies on this site are served or used by third parties. Karro Food Group do not use intrusive cookies, spyware, such as web bugs or hidden identifiers or other similar devices to gain access to information, store hidden information or to trace activities of users.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: www.allaboutcookies.org

6. **International Transfers**

We share your personal data within our Group. This may involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the EEA so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. **Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the transmission of information via the internet is not completely secure. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. **Data Retention**

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers, suppliers and/or business partners for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Your Rights](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Third Party Links

Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. Your Rights

You have the right to:

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 inaccurate 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 good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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 particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complain you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Information we may need from you we may need to request specific information from you to help us confirm your identity and ensure your right 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.

11. **Contact**

Questions, comments and requests regarding this privacy policy are welcomed, please either contact us by:

- Email: info@karro.co.uk
- Post: Norton Grove Industrial Estate, Hugden Way, Malton, North Yorkshire, YO17 9HG
- Telephone: 01653 693 031

Karro Food Group
1st June 2020