

## Deeside Cereals I Limited External Privacy Notice

This External Privacy Notice sets out what personal data we, Deeside Cereals I Limited, hold about you and how we collect and use it, when you make contact with the organisation for business purposes. . We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy which explains our obligations in relation to personal data and how we keep it secure. This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation came into force. We may update this Privacy Notice at any time.

### Who is the controller?

Deeside Cereals I Limited is the “controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

Rob Carr, Head of HR is the Data Lead for the organisation. He will also act as your first point of contact if you have any questions or concerns about data protection and he can be contacted by email: [jo.butterworth@deesidecereals.co.uk](mailto:jo.butterworth@deesidecereals.co.uk)

We will not share your personal data with any other group companies.

### What type of personal data do we hold about you?

**Personal data** means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, , , email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual’s actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We may hold and use various types of personal data about you, including, for example: biographical details; Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or orientations or biometric or genetic data that is used to identify an individual is known as special category data.( Everything else is **ordinary personal data**).

### Why do we hold your personal data and on what legal grounds?

We hold and use your ordinary personal data for business purposes including business administration and contact details. day-to-day business activities, etc.

Data protection law specifies the legal grounds on which we can hold and use personal data.

Most commonly, we rely on one or more of the following legal grounds when we process

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your personal data:

- Where we need it to perform a contract we have entered into with you (**performance of the contract**) whether this is a contract for services or another type of contract. This may include, for example, ensuring that we pay you correctly if you are a supplier.
- Where we need it to comply with a legal obligation (**legal obligation**). Typically, this may include legal obligations such as the obligation: to provide, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example,

We hold and use your special category data for purposes including, for example: facilitating meetings with trade union representatives, ensuring security of laptops/controlling access to our premises, signing in information including health conditions, food safety information required in line with our customer codes of practice or information relating to temperature checks when entering the site to support the guidance provided by the Health and Safety Executive and PHW to keep our employees safe].

Since special category data is usually more sensitive than ordinary personal data, we need to have an additional legal ground to use and hold it. Most commonly, as well as one of the legal grounds listed above, we rely on one or more of the following additional legal grounds when we process your special category data:

- Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security and the processing is in line with our Data Protection Policy (**legal obligation/right in relation to employment**)
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our Data Protection Policy (**public interest in monitoring equal opportunities within the workforce**)
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards (**assessment of working capacity**)

Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or where needed to protect your vital interests or those of another person. We may also occasionally hold and use special category data: to establish, exercise or defend a legal claim; where needed to protect your interests (or someone else's interests) where you are not capable of giving your consent; or where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under data protection law.

## How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold and use is generated by you in the course of carrying out

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your duties. For example, during email correspondence or when producing documents or when you are using certain equipment such as computers, door entry systems/clocking-in and out systems.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents.

Some of the personal data about you that we hold and use may come from external sources. For example: we may obtain information about you from publicly available sources such as your LinkedIn profile or other media sources; ; customers or internal representatives may give feedback about you; we might seek advice from a professional adviser that includes information about you..

## **If you give us someone else's personal data**

Sometimes, you might provide us with another person's personal data . In such cases, we require **you** to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

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

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where it is necessary in our legitimate interest.

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

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for external personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

For some types of personal data, it is more appropriate to decide retention periods on a case by case basis (also using the criteria described above).

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We will base these decisions on relevant circumstances, taking into account the criteria listed above.

## Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you 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 exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If you would like to exercise any of the above rights, please contact Rob Carr, Head of HR, Deeside Cereals I Ltd, Fourth Avenue, Deeside Industrial Estate, Deeside Flintshire, CH5 2NR in writing. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by us, you can contact the HR Data Protection Lead Rob Carr, Head of HR.

Note too that 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. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

Full contact details can be found on the following page.

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## Contact Details

Deeside Cereals I Limited

Fourth Avenue

Deeside Industrial Park

Deeside

Flintshire

Ch5 2NR

Tel: 01244 289188

Website: [deesidecereals.co.uk](http://deesidecereals.co.uk)

Data Lead: Rob Carr, Head of HR,

[Rob.carr@wholebake.co.uk](mailto:Rob.carr@wholebake.co.uk)

Applicable from 19<sup>th</sup> November 2022