#### **GDPR: DATA PRIVACY NOTICE FOR CUSTOMERS AND SUPPLIERS**

#### Introduction

Feedwell Animal Foods Limited is committed to protecting and respecting your privacy.

This policy 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.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the below address. We will promptly correct any information found to be incorrect.

#### 1. Definitions

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

## Categories of data: Personal data and special categories of personal data

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Processing -** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### 2. Who are we?

Feedwell Animal Foods Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Feedwell Animal Foods Limited, The Old Mill, Annsborough, Castlewellan, co. Down, BT31 9NH. For all data matters contact Vicky Dobbin on <a href="mailto:vicky@feedwell.com">vicky@feedwell.com</a> 02843 778765 or the address above.

### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To facilitate trade with you as a customer or supplier. Such data is required to set up a trading contract.

Internal record keeping.

To send you information relating to our products or our company.

## 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

□ Personal data: Name, address, telephone number, email address, card details in limited instances.

We have obtained your personal data directly from yourself or an employee of your organisation when we commenced trading with you. We update this data as and when we are informed of relevant changes.

### 5. What is our legal basis for processing your personal data?

### a) Personal data (article 6 of GDPR)

## Our lawful basis for processing your general personal data:

Processing necessary for the performance of a	CONTRACT RELATING TO THE SALE/PURCHASE
contract with the data subject or to take steps to	OF GOODS/SERVICES BETWEEN FEEDWELL
enter into a contract	ANIMAL FOODS LIMITED AND THE
	CUSTOMER/SUPPLIER

### 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with our Accountant, IT provider (for document storage) and Haulier (customer addresses only) all of whom have a strict GDPR policy. Any personal data held on site is held securely in locked cabinets and on protected IT packages.

## 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary - for a period of 10 years from when we cease our business relationship. In case of any legal claims/complaints or for money collection purposes.

## 8. Providing us with your personal data

We require your personal data as it is necessary to enter into a contract for trade.

### 9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit
  that data directly to another data controller, (known as the right to data portability), (where
  applicable i.e. where the processing is based on consent or is necessary for the performance of a
  contract with the data subject and where the data controller processes the data by automated
  means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

### 10. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

#### 11. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

#### 12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

# 13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### 14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our DATA PROTECTION OFFICER on <u>Vicky@feedwell.com</u> 02843 778765 Vicky Dobbin, Feedwell Animal Foods Limited, The Old Mill, Annsborough, Castlewellan, BT31 9NH.

### **15. Complaints Policy**

- We are committed to providing a high-quality service to all our customers. When something goes wrong, we need you to tell us about it. This will allow us to put things right for you and to help improve our service for others in the future.
- We take all complaints seriously and we aim to handle them quickly, effectively and in a fair and honest way.
- You can complain by sending us an email to info@feedwell.com, by writing to us at The Old Mill, Castlewellan, Co. Down, Northern Ireland, BT31 9NH or you can call us on 028 4377 8765 (from RoI . 048 4377 8765).
- A Director or Senior Manager will initially review the complaint. We will acknowledge a complaint within 5 working days. We will keep you informed about the progress of the investigation. We aim to have all complaints completed within 28 working days unless we agree a different time scale with you.
- You should register a complaint as soon as you can after the date on which the event occurred. If you complain more than three months later, we may not be able to investigate properly.
- At this stage, if you are still not satisfied, you should contact us again and we will arrange for a different Director or Senior Manager to review the initial decision. We will write to you within 28 days of receiving your request for a review, confirming our final position on your complaint and explaining our reasons.
- If you are still dissatisfied at this stage you can refer this matter to the Information Commissioners Office on 03031231113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England..