

May 2018

### SQUARE FOOD FOUNDATION PRIVACY POLICY INTRODUCTION

Square Food Foundation (composed of Square Food Foundation registered charity 1173323 and the Cookery School & Kitchen, CIC - company no. 7658940) respects your privacy and is committed to the responsible handling and protection of personal data. This Global Privacy Policy ("Privacy Policy") provides information about how Square Food Foundation handles and protects personal data and how we look after your personal data, including when you visit our website (regardless of where you visit it from), and tells you about your privacy rights and how the law protects you.

## **Activities**

Square Food Foundation teaches people of all ages, abilities and walks of life to cook from scratch. To do this, we raise funds from different sources (including via our trading arm, the Cookery School & Kitchen CIC as well as from donations, corporate gifts and grants made by trusts and foundations). Square Food Foundation communicates its impact to supporters using multiple channels including printed materials, email, social media and film.

## IMPORTANT INFORMATION AND WHO WE ARE

### **PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy aims to give you information on how Square Food Foundation collects and processes (i) your personal data through your use of this website and otherwise, including any data you may provide through this website when you make an online donation, use the online store, sign up to receive our newsletter, submit an enquiry through one of our websites, and (ii) personal data we collect from individuals associated with contracts we have entered into with third parties in relation to our Activities.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other notices and is not intended to override them.

## **CONTROLLER**

As mentioned above, Square Food Foundation is composed of two legal entities. This privacy notice is issued on behalf of both Square Food Foundation entities, so when we mention "Square Food Foundation", "we", "us" or "our" in this privacy notice, we are referring to the relevant Square Food Foundation entity responsible for processing your data. We will let you know which entity will be the

controller of your personal data whenever we interact with you, for example when you purchase a product from us or when we send you our newsletter.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 17<sup>th</sup> May 2018. It is important that you check frequently to see if there have been any updates to this Privacy Policy. If we make changes we consider to be important, we will place a notice on this website, and/or contact you to let you know.

The data protection law in the UK will change on 25 May 2018. Although this Privacy Policy sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests immediately as we are still working towards getting our systems ready for some of these changes. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### THE DATA WE COLLECT ABOUT YOU

"Personal data" means any information relating to an identified or identifiable natural person; 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. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows: • Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. • Contact Data includes billing address, delivery address, email address and telephone numbers. • Financial Data includes bank account and payment card details. • Transaction Data includes details about payments from you and other details of products and services you have purchased from us. • Technical Data includes internet protocol (IP) address, your login data, 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. • Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. • Usage Data includes information about how you use our website products and services. • Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. We may 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 your Usage Data to calculate the percentage of users accessing a specific website feature. 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect personal data from, amongst others, individuals who register to attend our cookery classes and courses, individual fundraisers, event organisers, grant-making trusts and foundations, corporate supporters and partners, individuals who attend our events, individuals who use our online store, donors, individuals who opt to receive our newsletter and individuals associated with contracts we have entered into with third parties in relation to our Business Activities.

We use different methods to collect data from and about you including through: • Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you register with us online, register with us at festivals or events at which we are present, enter competitions run by us, use our online store, opt to receive our newsletter, make a donation, or submit an enquiry or provide us with feedback. • Automated technologies or interactions. In addition, our servers, logs, and other technologies automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further information. Third parties or publicly available sources. Not all of the personal data Square Food Foundation holds about you will always come directly from you. It may also come from third party appeal hosts, third party fundraising platforms, publicly accessible sources or from a third party under the terms of a contract which we have entered into.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.

• Where we need to comply with a legal or regulatory obligation. Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending certain direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the contact details at the end of this Privacy Policy.

## PURPOSES FOR WHICH WE WILL 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.

"Legitimate interest" means the interest of Square Food Foundation in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using the contact details at the end of this Privacy Policy.

"Performance of a contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

"Comply with a legal or regulatory obligation" means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. 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, donor or supporter	(a) Identity (b) Contact	Performance of a contract with you
To process transactions with you and deliver any order including managing payments, fees and charges	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Financial</li><li>(d) Transaction</li></ul>	Performance of a contract with you

To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or Privacy Policy  (b) Asking you to leave a review or take a survey	(e) Marketing and Communications  (a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications	<ul> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers, supporters and donors use our products/services)</li> </ul>
To enable you to partake in a prize draw, competition or complete a survey	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Profile</li><li>(d) Usage</li><li>(e) Marketing and Communications</li></ul>	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers, supporters and donors use our products/services, to develop them and grow our charity)
To administer and protect Square Food Foundation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	<ul> <li>(a) Necessary for our legitimate interests</li> <li>(for running Square Food Foundation, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or restructure)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Profile</li><li>(d) Usage</li><li>(e) Marketing and Communications</li><li>(f) Technical</li></ul>	Necessary for our legitimate interests (to study how customers, supporter and donors use our products/services, to develop them, to grow Square Food Foundation and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer, supporter and donor relationships and experiences	(a) Technical (b) Usage	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 and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Technical</li><li>(d) Usage</li><li>(e) Profile</li></ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)
To recoup Gift Aid in relation to donations received by you	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Marketing and Communications<sup>1</sup></li> <li>(d) Transaction data</li> </ul>	Necessary for our legitimate interests (to optimise donations where legally possible to do so)

MARKETING We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You may also receive marketing communications from us if you have signed up to receive our newsletter, bought one of our products, registered with us or donated to us online and, in each case, you have given us your express opt-in consent to receiving such marketing communications.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

# **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this websites may become inaccessible or not function properly. For more information about the cookies we use, please see XXX

### **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 using the contact details at the end of this Privacy Policy. 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.

### 5. DISCLOSURES OF YOUR PERSONAL DATA

Square Food Foundation shares or discloses personal data when necessary for the purposes set out in the table in paragraph 4 above. When we share personal data, we do so in accordance with applicable law. Below are the parties with whom we may share your personal data and why we share it.

- Our business partners: We partner with other organisations in order to carry out our Activities. Occasionally, these arrangements may involve us sharing your personal data with the organisation in question.
- Our third-party service providers: We engage third-party service providers such as event organisers in the United Kingdom and IT and website providers in the US.
- Third parties for legal reasons: We will share personal data when we believe it is required, such as:
- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence;
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, investments or assets (including in connection with any bankruptcy or similar proceedings); and/or
- To protect our rights, privacy, safety, or property, or those of other persons.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

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.

## 6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will 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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- 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. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- 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. For further details, see European Commission: EU-US Privacy Shield. 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. DATA 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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Our security policies and procedures include:

- Measures in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of personal data;
- Appropriate measures and controls, including monitoring and physical measures, to store and transfer personal data securely;
- Training and informing staff: We provide privacy and data security information to all new joiners as well as making them aware of our protocols and procedures regarding the protection of personal data to ensure that they are informed about our information security policies and procedures and aware of their responsibilities; and
- Third party risk management: We require any third party service providers with whom we share personal data to protect such personal data in accordance with our security policies and procedures. 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

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes for which it is processed, 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. When we no longer need personal data, we seek to ensure that it is securely deleted or destroyed.

### 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Below is a summary of your legal rights in relation to your data:

- Access to personal data: We will give you access to your personal data upon request, subject to any relevant legal requirements and exemptions.
- Correction and deletion: you have the right to correct or amend your personal data if it is inaccurate or requires updating. You may also have the right to request deletion 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.
- Withdrawal of consent: where Square Food Foundation is processing your personal data on the basis that you have consented to such processing, you have the right to withdraw that consent at any time. 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.
- Objection 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.
- 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 (where we are relying on a

legitimate interest (or those of a third party)) but we need to verify whether we have overriding legitimate grounds to use it.

• Filing a complaint: if you are not satisfied with how Square Food Foundation manages your personal data, you have the right to make a complaint to a data protection regulator. A list of National Data Protection Authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.htm. We would, however, appreciate the chance to deal with your concerns before you approach a National Data Protection Authority, so please contact us in the first instance. If you wish to exercise any of the rights set out above, please contact the Square Food Foundation Communications Manager at <a href="info@squarefoodfoundation.co.uk">info@squarefoodfoundation.co.uk</a>; 0117 9039780

## **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### WHAT 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.

TIME LIMIT TO RESPOND We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. CONTACT US**

We have appointed the Square Food Foundation Communications Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights regarding the processing of your personal data, please contact the Square Food Foundation Communications Manager using the details set out below.

**CONTACT DETAILS** Our full details are: Full name of legal entities: Square Food Foundation & The Cookery School & Kitchen, CIC

Email address: info@squarefoodfoundation.co.uk

Postal address: Square Food Foundation, The Park, Daventry Road, Bristol, BST, BS4 1DQ, United

Kingdom

Telephone number: 0117 903 9780