

	<b>INTEGRATED MANAGEMENT SYSTEM</b>  Privacy Notice	<b>QA 194</b>
	Control classification: Public	Version: 2 Effective: 01/04/2019

## 1.0 PRIVACY NOTICE

**Wellhopped Ltd is the parent company of the group containing Charles Faram & Co Ltd (UK), Hawkins & Floyd Ltd (UK), Charles Faram Inc. (USA). and Charles Faram Brewing Supplies Inc. (Canada).**

The group companies supply ingredients, products and advice to the drinks industry.

### 1.1 The Data Protection Manager can be contacted directly:

Telephone: 01905 830 734

Email: [dp@charlesfaram.com](mailto:dp@charlesfaram.com)

### 1.2 What personal data will we collect?

The personal data we would like to collect from/process on you is from the list shown below. We will tell you explicitly at the point of collection which data we require, the lawful grounds for processing and the retention time:

Personal data type	Source
Name	Data Subject or Other
Address	Data Subject or Other
Telephone number(s)	Data Subject or Other
Email address	Data Subject or Other
Signature on contract	Data Subject
Bank account details	Data Subject

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### 1.3 **The personal data we collect will be used for the following purposes:**

- Provision and maintenance of contract
- Client contact to resolve issues
- Client contact to plan, deliver and install or maintain products
- Data sharing between operational teams to assist in meeting client requirements
- Complaints investigation and resolution
- Performance and KPI data analysis
- Invoicing and contract financial management

### 1.4 **Our legal basis for processing for the personal data:**

To meet the contractual obligations entered into by you the client and the data subject.

Purposes of legitimate interests pursued by the controller

Processing is necessary to comply with the legal obligation of the controller

Consent given by you, the data subject

### 1.5 **Legitimate interests**

Any legitimate interests pursued by us, or third parties we use will be advised to you at the time we collect your personal data.

### 1.6 **Consent**

- By accepting this privacy notice, you are giving us your permission to process your personal data specifically for the purposes identified.
- Consent is required for Wellhopped Ltd to process personal data where there is no overarching legal reason for the processing of personal data, but it must be freely given. Where we are asking you for sensitive data, we will always tell you why and how the information will be used.
- Where we are processing your personal data on the basis of consent, you may withdraw your consent at any time by following the procedure described in our document: Withdrawal of Consent Procedure.

### 1.7 **Disclosure**

- Wellhopped Ltd will not pass on your personal data to third parties without first obtaining your consent, unless that is a necessary part of our processing procedure and we have advised you of that need at the point of the collection of the data.
- We may pass your personal data to the following third parties for the reasons shown below as part of the processing activities.

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<b>Name of organisation</b>	<b>Location EU/Non EU</b>	<b>Safeguards in place to protect your personal data</b>	<b>Reasons for sharing data</b>
HMRC	EU	GDPR compliant	Legal obligations of the controller
Fedex DPD White Logistics Freightroute JGS Couriers Davies Turner Davies Turner Aircargo Ltd Avon Freight DHL Schwartz logistics ABE Transport	EU/Non- EU	Fulfilment of transportation services	Adherence to GDPR
DEFRA ( Department for Environment, Food & Rural Affairs) APHA (Animal and Plant Health Agency) RPA (Rural Payments Agency) FDA (US Food & Drug Administration)	EU/Non- EU	Compliance with food safety standards and quality control	Adherence to GDPR
Weyermann® Malt Murphy & Son Totally Natural Solutions Castle Malting Rankin Brothers & Sons Fermentis	EU	Fulfilment of distributor services	Adherence to GDPR

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Chamber of Commerce	EU	Fulfilment of services	Adherence to GDPR
Oak Innovation	EU	Fulfilment of communications services	Adherence to GDPR
Salesforce	Non-EU	Fulfilment of data storage services	Adherence to GDPR
EOH	EU	Fulfilment of data storage services	Adherence to GDPR
Datel	EU	Fulfilment of IT services	Adherence to GDPR
Grant Thornton UK LLP and its associated firms	EU/Non-EU	Statutory audit	Adherence to GDPR

## 2.0 RETENTION OF DATA

2.1 Wellhopped Ltd will process and store the personal data in accordance with the company retention period as detailed in the Retention Period Procedure.

## 3.0 DESTRUCTION OF DATA

3.1 At the point that the company's retention policy has determined that any personal data is to be deleted/destroyed, it is a requirement of the GDPR that removal of data is carried out securely. Wellhopped Ltd destroy personal data as follows:

- Physical documentation is shredded internally once the purpose for which those documents were created is no longer relevant. Archive material is palletised, labelled as 'Shredding' and is collected by a contracted third party to be shredded securely.
- Electronic data is deleted from the server location(s)

## 4.0 YOUR RIGHTS

4.1 At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you in line with the Subject Access Request procedure and using the Subject Access Request Form.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

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- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – and to challenge the results of any automated processing or profiling carried out by a law enforcement agency.
- Right to judicial review: if Wellhopped Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

4.2 All of the above requests will be forwarded on should there be a third party involved in the processing of your data.

4.3 If you wish to exercise any of these rights, please contact the Data Protection Manager by email: [dp@charlesfaram.com](mailto:dp@charlesfaram.com)

## 5.0 COMPLAINTS

11.1 In the event that you wish to make a complaint about how your personal data is being processed by Wellhopped Ltd or by a third party as described above or about how a complaint has been handled, you have the right to complain to Wellhopped Ltd data protection representative, or to lodge a complaint directly with the supervisory authority.

11.2 The details for these contacts are:

	Supervisory authority contact details	DPM contact details
Contact name	Information Commissioner's Office	Charles Faram & Co Ltd
Address line 1	Wycliffe House	The Hop Store
Address line 2	Water Lane	Monksfield Lane
Address line 3	Wilmslow	Newland
Address line 4	Cheshire	Worcestershire
Address line 5	SK9 5AF	WR13 5BB
Email	<a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>	<a href="mailto:dp@charlesfaram.com">dp@charlesfaram.com</a>
Telephone	0303 123 1113	01905 830 734

## 6.0 DOCUMENT OWNER AND APPROVAL

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- 6.1 The Data Protection Manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the document control procedure.
- 6.1 A current version of this document is available to all members of staff at: "Z:\QC\Quality Control\GDPR compliance\GDPR notices\N007 Privacy notice.docx"
- 6.2 This procedure was approved on 02.10.2018 and is issued on a version-controlled basis under the signature of the Managing Director on delegated authority from the Board.

**Revision History**

<b>Version</b>	<b>Reason for Revision</b>	<b>Supersedes Document: VERSION AND DATE</b>	<b>Signature of Managing Director</b>
V1	New document		
V2	Changes to 8.1 and addition of email address to 9.3	V1 02/10/2018	

END of DOCUMENT

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