



# SOMERSET LARDER

## Privacy Policy



## Definition

The purpose of this Policy is to set out the terms of Somerset Larder's position on the collection, use and disclosure of personal information that is obtained when you visit our website or that is provided by you (the customer).

We take your right to privacy seriously and should we ask you to provide information by which you can be identified, you (the customer) can be assured that these details will only be used in accordance with this Privacy Policy and only for the reasons you are aware of.

## Document Owner & Approver

<b>Document Owner</b>	Sally Spuffard	29 <sup>th</sup> July 2019
<b>Approvers</b>	Stephen Stapenhill-Hunt	30 <sup>th</sup> July 2019

## Document Version Control

<b>Version</b>	<b>Version Date</b>	<b>Document History</b>
1.0	29 <sup>th</sup> July 2019	1 <sup>st</sup> Format

**For distribution to all**



## About this Privacy Notice

- The following references to (we, us or our) mean Somerset Larder;
- References to (you or your) means you the customer, the person accessing our website or the person providing the personal information as explained in this privacy notice;
- All references to the website are in line with Somerset Larders website;
- Personal information is the information that is about you and which identifies you;
- Our website is not intended for children and we do not knowingly collect data relating to children;

We request that you read this Privacy Policy when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your personal information. This Privacy Policy supplements the other notices and is not intended to override them.

## Who is responsible for the personal information we collect?

We (Somerset Larder) are the data controller for the purpose of data protection law, in respect of your personal information collected or obtained as outlined with this our Privacy Policy. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

Should you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact our Privacy and Compliance Manager at [info@somersetlarder.co.uk](mailto:info@somersetlarder.co.uk)

## What personal information do we hold about you?

We may collect and process the following categories of information about you for different reasons, depending on why you are in touch:-

- Customers, website users, social media users, members of the public;
- Job applicants;
- Contractors, suppliers and others who we do business with;
- Information we receive from other sources;



## How we will use personal information we hold about you

We will only use your personal information when there is a legal basis for us to do so. Most commonly, we will use your personal information in the following circumstances:-

- Where we need to perform the contract we are about to enter into or have entered into with you, for example in relation to job applicants, contractors and or suppliers (for the performance of a contract 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 (for our legitimate interests of for a third party's legitimate interests);
- Where we need to comply with a legal or regulatory obligation (to comply with our legal obligations);
- Where we or another person need to do so as part of carrying out a task in the public interest or carrying out public functions which are laid down in law, for example exercising statutory rights and carrying out our legal duties under our licences to operate;
- Where you provide us with your express or explicit consent (with your consent);

Your personal information may be used by us, our employees, service providers and disclosed to third parties for a number of different purposes which we have set out below. For each of these purposes, we have set out the legal basis we rely on to do so.

**Please note:** We may process your personal information on more than one legal basis depending on the specific purposes for which we are using your personal information. Please contact our Privacy and Compliance Manager if you need details about the specific legal basis we are relying on to process your personal information where more than on legal basis has been identified, this includes recruitment and other purposes not relating to recruitment or employment.

## Failure to provide us with your personal information

We may be required to obtain your personal information to comply with our legal obligations or for the performance of our contract with you or to fulfil a request you have made. If you do not provide the relevant personal information to us, we may not be able to enter into the contract with you or properly perform our obligations under it. We may also be unable to fulfil your request.



Where your failure to provide information breaches a legal obligation we may be required to report this to regulators or law enforcement bodies. We will generally notify you of the consequences of failing to provide us with required information at the time.

## Automated decision making

We do not undertake any processing of your personal information by automated means in order to make decisions about you.

## Who we may disclose your personal information to

We may share your personal information with:-

- **Our group companies** or other companies and entities within the group of South West Larder Limited trading as Somerset Larder Limited;
- **Our service providers** – our business partners, suppliers, contractors and their sub-contractors for the performance of any contract we enter into with you or for the performance of any contract we enter into with them which relates to our business and under which they deliver work and services to us, including works and services which may involve processing personal information on our behalf such as IT service providers;
- **Third parties** involved in the business / maintenance works and other aspects of the business – Including third party contractors;
- **Our banks, insurers, professional advisers and agents** – including our banks, accountants, lawyers, insurers, brokers, agents, consultants and other professional advisers that assist us in carrying out our business activities and public functions;
- **Governmental, regulatory and legal authorities and third parties involved in legal action** – Government departments, governmental agencies, regulatory organisations and justice agencies (including the courts, tribunals, policy, security services, Her Majesty's Revenue and Customs, local authorities, the Home Office, the Information Commissioner, the Health and Safety Executive, and other regulators and law enforcement bodies);
- **Prospective sellers or buyers of our business and assets** – In the event that we sell or buy any part of the business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets;
- **Health Professional and Emergency Services** – In the event of an emergency we may disclose personal information to health and medical professionals and emergency services where the health, safety or security of a person is at risk;



## How we protect your personal information

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, altered, used, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to access this only and who are subject to a duty of confidentiality. In the case of third party data processors, they will only process your personal information on our instructions and have their own legal obligations under data protection law to protect your personal information and keep it secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any application regulator of a breach where we are legally required to do so.

## Where we will transfer your personal information

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA) eg:-

- Where members of our staff needs to access your personal information remotely while they are travelling outside of the EEA;
- If you are based outside the EEA;

These transfers are subject to special rules under European and UK data protection law. In those circumstances, we undertake an assessment of the level of protection in light of the circumstance surrounding the transfer. We will make sure that any transfers are limited to the minimum amount of personal information possible and will always take steps to ensure that your personal information is adequately protected. In certain circumstances we may need to see your consent unless there is an overriding legal need to transfer the personal information.

## How long we will keep your personal information for

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

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



In some circumstances we may anonymise your personal information (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.

## **Your rights and choices in relation to your personal information**

You may have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the information below for a summary of your rights. You can exercise these rights by contacting the Data Protection Manager:-

- Rights to access your personal information;
- Right to rectify your personal information;
- Right to ensure of your personal information;
- Right to restrict the use of your personal information;
- Right to data portability;
- Right to object to the use of your personal information;
- Right to withdraw consent;
- Right to complain to the Privacy and Compliance Manager;

## **No fee usually required**

You will not have to pay a fee to access your personal information (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 access to your personal information (or to exercise any of your other rights). This is a security measure to ensure that your personal information 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, however, 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 of our timescales. For more detailed information on our GDPR Regulations please see our Data Protection Policy.

## Website cookies and third party links

A cookie is a small text file that's stored on your computer or mobile device when you visit a website.

We use cookies to:-

- Remember your preferences;
- Tailor our sites and services to your interests;

You can set your browser not to accept cookies and the website below can give more information about deleting and controlling cookies [www.aboutcookies.org](http://www.aboutcookies.org)

## Third party links

Our 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 how they handle your personal information.

## Changes to our Privacy Policy and your duty to inform us of changes

This Privacy Policy was last updated as per the document control table at the front of this document.

Any changes we make to this Privacy Policy will take effect as soon as it has been updated or otherwise communicated out.

Please ensure that you keep us informed of your personal information changes during your relationship with us.





## Contact us

For further questions or requests regarding our Privacy Policy please forward your email to:-

Privacy and Compliance Manager  
Somerset Larder  
Suite A  
Compass House  
North Petherton  
Bridgwater  
TA6 6FA

[info@somersetlarder.co.uk](mailto:info@somersetlarder.co.uk)