

S&B Herba Foods Limited

Privacy Notice

Data Controller

S&B Herba Foods Ltd
Central Court
Orpington
Kent BR6 0JA

Tel: 01689 878700

www.sbfh.com

Ebro Foods
Paseo de la Castellana,
nº20
28046 Madrid
Spain

<http://www.ebrofoods.es/en/>

Available:

* Website

* Email (on request)

* via our Sales T&C's

* Recruitment Agencies

* Job Applicants

GENERAL

S&B Herba Foods Ltd are suppliers of Food Ingredients to the Retail, Wholesale and Manufacturing sectors. We are part of the Ebro Foods Group, Spain. In the course of transacting business and developing relationships we process and store limited personal data which is subject to the General Data Protection Regulation (EU 679/2016) ("GDPR") and any legislation in the UK to enact GDPR. This notice replaces any previous Privacy Policy and/or Fair Processing Notice issued under the Data Protection Act 1998.

Information We Collect and Why We Collect It

The majority of our business is conducted on a B2B basis, so the extent of personal data being processed is limited.

We may collect the following data:

Customer/Suppliers/Service Providers/Consumers

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|--|--|
| Name of Company; Address; Company Registration Number | To carry out Credit Checks; Managing contractual relationship |
| Contact Name(s); Email; Home Address; Telephone and mobile numbers | Provided by you in order to manage communication channels in terms of the contractual and ethical relationship; Out of Hours contact |
| Bank Details | To allow payment or refund of goods; services; other promotional agreements as per the contractual arrangement |

Marketing

| | |
|---|--|
| Mailing Lists - Names, addresses, E-Mail | <p>These are purchased from 3rd Parties and do not contain any other Personal Information.</p> <p>These mailing lists contain details only of recipients that have consented to receive marketing material These are used for direct mailing only, which are printed and mailed by a third-party company, using encrypted files. They delete these details on completion of the mailing.</p> <p>We check prior to purchasing that the data has been consented to and in date.</p> |
| Customer and consumer enquiries and complaints – Name; Address; Email Address; Contact Phone Number | We use this data to action Enquiries only and will not be used for any other purposes or shared with a third party. |

Competitions / Promotions

| | |
|--|--|
| Name; Address; Email; Contact Telephone Numbers (No Opt-In) | We use this data for the purposes of running the competition / promotion and will not be used for any other purposes or shared with a third party. These details will be deleted after 6 months. |
| As above – with Opt In | A specific option will be available on certain competitions/promotions to collect data you have allowed in order to keep you informed of future competitions/promotions. We will hold these details for 5 years unless Opt-In cancelled. |

Recruitment

| | |
|--|--|
| Speculative CV's – Name; Address; Date of Birth; Marital Status; Email Address; Telephone Number; Mobile Number; employment history and educational and other achievements. | We do try and respond/acknowledge your application but we will not retain your details if we do not have any vacancies. If a CV is of potential interest, we will store this for a maximum of 12 months. |
| Curriculum Vitae / Job Applications in direct response to a vacancy – Name; Address; Date of Birth; Marital Status; Email Address; Telephone Number; Mobile Number, employment history and educational and other achievements. | We will hold your data for a maximum of 12 months as part of our Recruitment Policy. |
| Curriculum Vitae – via Agencies. Name; Address; Mobile Number, employment history and educational and other achievements. | We will hold your data for a maximum of 12 months as part of our Recruitment Policy. |
| Social Media – Twitter Profiles, LinkedIn | We may carry out searches on Social Media but will not store or use that data for any other purposes but to build candidate profile and it will be deleted in line with our Recruitment Policy |

Online

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|---|--|
| Customer and Consumer Enquiries and complaints via web contact form | This is received into one mailbox on our email system. It is from there we action it accordingly. This mailbox will be periodically deleted every 12 months. It is not shared with a 3 rd party outside of S&B Herba Foods. |
| IP Addresses | We do not collect this data. |
| Facebook, Twitter & Instagram Account | Due to the nature of our business, we do not run any of these accounts for S&B Herba Foods. We do, however, have Facebook, Twitter and Instagram accounts for Sun-Maid (UK) (S&B Herba Foods are responsible for the distribution and marketing of the Sun Maid Brand in the UK) which is managed by 4 Media Relations – data is only collected when we run competitions or receive a complaint or enquiry. It is not used for any other purpose and S&B Herba Foods and 4 Media Relations do not share that data with any other third party. http://www.4mediarelations.co.uk/privacy |

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|------------------|---|
| Cookies | SBHF's website does not use or collect cookies, however, Google Analytics code does. See section below. |
| Google Analytics | SBHF's website uses Google Analytics code, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in Europe and the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Google's privacy policy is available at https://www.google.com/policies/privacy |

Bases for Processing & Storing Your Data

All data processing activities fall within the following legal bases:

Contractual:

- manage orders and prices;
- supply of goods;
- purchasing materials and goods
- complaints;
- payments.
- procurement of services

Legal:

- Comply with the Law and Regulations such as Food Safety Act; Sale of Goods Act; Modern Slavery Act
- Meeting Financial Auditing requirements

Legitimate Interests:

- Keep up to date contact information for current and future business transactions
- Analyse and Provide Market Data
- Completion of Industry Regulated Questionnaires in particular Ethical conformance.
- Provide Promotional Activity
- Employment consideration
- Required for prosecution or defence of legal claims
- Fraud Protection & Detection
- Out of Hours contacts provided by Customers for Crisis/Product Recall Issues

Consent

- For any consumer Competitions and/or Promotions where Opt-In has been received.

All data relating to business transactions will be held for a period of 7 years and then securely destroyed. We ensure all processors of data are GDPR compliant.

Disclosure of Data

Limited Personal Data may be available for Auditing, Regulatory and Legal purposes both in the UK and by our Parent Company, Ebro Foods.

Security of Data

Our IT infrastructure includes several security layers which provide essential protection from unauthorised access. These include; perimeter firewalls, antivirus and malware monitoring, spam filtering, physical and electronic access control, and multilevel encryption on backups and end-to-end on emails sent. Whilst most of this is behind the scenes and away from user interaction, an important area is user passwords. Users are encouraged to change their password regularly and to not share it with anyone. If there is a suspicion that it is known, then it should be changed immediately and reported to the IT Department.

Personnel with access to Company Mobile Phones and Laptops ensure that their equipment is password protected and take the utmost care when taking these outside of the workplace whether in the UK or overseas on business. We have a procedure for reporting lost and stolen hardware and robust IT interventions to limit data access in these situations.

We have procedures in place to deal with any data security breach and will notify the ICO or you where we are legally obliged to do so

How Long Do We Keep Data

Personal Data we collect will be used for maintaining regular contact with clients, customers and suppliers in the course of maintaining business relationships. It will be kept for as long as reasonably necessary to comply with our legal, contractual and regulatory obligations. In some incidences we have been specific within this policy.

3rd Party Processors

We keep the Processing & Access to our Company Data (which may include small amounts of Personal Data) to a limited number of Processors. These are listed below

| | |
|-----------------------------|--|
| Ernst & Young LLP | Company Auditors |
| Clarkson Wright & Jakes LLP | Company Solicitors |
| Sedex & Bureau Veritas | Ethical Regulatory Body & Auditors |
| Allteks | Disaster Recovery / IT Back up |
| Rocktime | Website Hosts |
| Best Reception | Offsite Reception call centre |
| 4 Media Relations | Management of UK SunMaid Twitter Account |
| MCB Imaging Services | Offsite Document Scanning |
| Graydon | Credit Check Agency |
| LeA Printers | Business Mailings |

We carry out checks on all processors whom we engage to ensure that they have appropriate organisational and technical measures in place to protect the confidentiality of personal data.

Your Rights

The Right to Erasure

In certain circumstances, you may ask for your personal data to be erased. This will be carried out if the reason you supplied us with this information is no longer necessary to fulfil the original purpose, and it does not conflict with other factors why we hold it such as some regulatory or legal obligation.

Restriction of Processing

If you believe any data we hold on you is no longer required to be processed, you are entitled to ask us to stop or restrict processing/using your data. Again, this will be assessed against whether it is still required for any legal and/or regulatory obligation.

Right to Rectification

We do our utmost to ensure any data we hold on you is accurate and we may take steps to contact you to ensure this is the case. However, if you believe this not to be the case, please contact us via our website or your normal point of contact to get this amended.

Right to Access your Personal Information

If you wish to receive details of any Personal Information we hold about you and how we use it, please contact us. There will not usually be a charge for this.

Consent

None of the processing we carry out on a B2B basis requires your consent, due to type of data we collect and why we process it. Therefore, your consent cannot be withdrawn for this type of lawful processing.

Any consent specifically given for marketing purposes can be withdrawn and you should contact sales@sbhf.com.

Right to data portability

This applies to personal data which was provided by the data subject and is processed by automated means and applies where the basis of processing is consent or performance of a contract. You have the right to receive your data in a structured, commonly used and machine readable form.

Right not to be subject to automated decision making

We do not use automated decision making.

Complaints

Contact for information or complaints regarding your data should be addressed to

Clare Syers
HR Manager
S& B Herba Foods Limited
Central Court
Orpington
Kent BR6 0JA

E: clare.syers@sbhf.com

If you have contacted us with a request set out above and this has not be dealt with to your satisfaction, you have the right to complain to the Information Commissioner's Office (ICO) <https://ico.org.uk>