



# PRIVACY POLICY

## 1. Introduction

This Privacy Policy governs the processing of any personal information collected on the Bright Blue Foods Limited website (at [www.bbflimited.com](http://www.bbflimited.com)), (the "**Site**").

We are Bright Blue Foods Limited a company registered in England and Wales (Company No. 08211695) with its registered office at Unit G, Sett End Road, Shadsworth Business Park, Blackburn, Lancashire, BB1 2PT ("**we**", "**our**", "**us**", "**the Company**").

We are a "Data Controller" for the purposes of the General Data Protection Regulation ((EU) 2016/679) ("**GDPR**") and the Data Protection Act 2018 whilst undertaking our business services.

We are committed to protecting and respecting your privacy. This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully as it contains important information on our practices regarding your personal information and how we, as a data controller, will treat personal information you provide to us through the Site, including the information we collect, what we do with the information you provide to us and who we may share your information with.

Our Site also uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.

## 2. Data Protection Principles

We will comply with data protection law and principles, which means that your information will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

## 3. The type of information we collect about you

If you purchase services from us, communicate with us, or do business with us, this will result in us collecting personal data about you. We will collect, store, and use the following types of personal information about you:

- Contact details such as the name, address, email, fax and telephone number of business contacts.
- Bank and transaction details such as details about payments to and from you and other details of products and services you have purchased from us.
- Technical information such as includes 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.
- Information about our service to you including [your username and] password, purchases or orders made by you, your preferences and any feedback you give us.
- Records of your correspondence with us if you contact us.
- Information about how you use our website, products and services.
- CCTV footage in the event you appear on CCTV installed by us on your behalf.
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We do not normally collect “special categories” of sensitive personal data from our customers or users of our website. In the event you provide us with any special category data, we will take extra care to ensure your rights are protected.

#### **4. How is your personal information collected?**

We collect your personal information through different methods including:

- Direct interactions with you by telephone, e-mail, phone or otherwise.
- Through the service we provide to you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

#### **5. How we will use your personal information**

We will only use your personal information 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 information other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to such marketing at any time.

## **6. Purposes for which we use your personal information**

We need all the categories of information in the list above (see The type of information we collect about you above) primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- To register you as a customer.
- Where you agree, provide you with information, products or services that you request from us or which we feel may interest you.
- To operate and improve the Site.
- To perform our contract or service to you.
- To manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback.
- To administer and protect the business and the Site.
- To make suggestions or recommendations to you about similar goods or services that may be of interest to you.
- To ensure that content from the Site is presented in the most effective manner for you and for your computer or device.
- To allow you to participate in interactive features of our services and membership when you choose to do so.

## **7. If you fail to provide personal information**

If you fail to provide certain information when requested either by law, or under the terms of a contract we have with you and you fail to provide that information 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 service you have with us but we will notify you if this is the case at the time.

## **8. Change of purpose**

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **9. Cookies**

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. By continuing to browse the Site, you are agreeing to our use of cookies.

A "cookie" is a piece of information that is stored on your computer, tablet or phone to recognise your browser and which records how you have used a website. This means that when you go back to that website, it can give you tailored options based on the information it has stored about your last visit. You can normally alter the settings of your browser to prevent it from accepting cookies.

### **How do we use cookies?**

We may use cookies to improve the way the Site works and to monitor how people use our Site. This helps us to understand how people use our Site so we can develop and improve the design, layout and function of the Site.

The cookies we use are explained below:

#### **Strictly necessary cookies**

These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for, such as logging into your account, cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

#### **Functionality cookies**

These cookies allow our Site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, a website may be able to provide you with news or updates relevant to the policies you buy. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised. They do not gather any information about you that could be used for advertising or remember where you have been on the internet.

#### **Third Party Cookies**

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.

#### **Google Analytics**

The Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyse how users use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use

of the Site, compiling reports on Site activity for 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. Google lists the cookies used by their analytics service on the following web page:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

### **How to reject cookies**

If you do not wish to receive cookies that are not strictly necessary to perform basic features of our Site you can set your browser to reject cookies or to tell you when a website tries to put a cookie on your computer.

Note that most web browsers will accept cookies, but if you would rather that we did not collect data in this way you can choose to accept all or some or reject cookies in your browser's privacy settings. Rejecting all cookies means that certain features on the Site cannot then be provided to you and accordingly you may not be able to take full advantage of all our Site's features. The "Help" menu in the bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

### **More information**

For more information generally on cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies>.

## **10. Sharing your personal information**

Where we are acting in our capacity as data controller we will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Where it is legally required or necessary in accordance with data protection law, we may share personal information with:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. Analytics and search engine providers that assist us in the improvement and optimisation of the Site;
- Auditors, accountants and financial organisations;
- Insurers, solicitors, professional advisers and consultants;
- Survey and research organisations;
- Police forces, courts, tribunals; and
- Professional bodies.

We may be required to share your information with third-party service providers (including contractors, suppliers and designated agents). The activities carried out by third-party service providers include, but are not limited to: [IT support, website design and payment merchants].

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or the police or to otherwise comply with the law.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions

## **11. Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## **12. Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, 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.

Details of retention periods for different aspects of your personal information are available in our Retention Policy which you can request from us by contacting us.

## **13. What rights do you have?**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your business relationship with us.

Under certain circumstances, by law you have the right to:

- a) Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- b) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c) Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

- d) Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- e) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- f) Request the transfer of your personal information to another party.
- g) If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Cheryl Charnley, Head of HR, [c.chnarnley@bbflimited.com](mailto:c.chnarnley@bbflimited.com). Bright Blue Foods Limited, Sett End Road West, Shadsworth, BB1 2PT. Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Cheryl Charnley, Head of HR, [c.chnarnley@bbflimited.com](mailto:c.chnarnley@bbflimited.com). Bright Blue Foods Limited, Sett End Road West, Shadsworth, BB1 2PT. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Complaints:**

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see contact details section below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us:

You can e-mail us at [info@bbflimited.com](mailto:info@bbflimited.com) or write to us at the following address:

Bright Blue Foods Limited

Sett End Road

Blackburn

BB1 2PT

### **Changes to this Privacy Policy**

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Privacy Policy, please contact Cheryl Charnley, Head of HR, [c.chnrley@bbflimited.com](mailto:c.chnrley@bbflimited.com). Bright Blue Foods Limited, Sett End Road West, Shadsworth, BB1 2PT.