

Privacy Policy – Glanmore Foods

Last Updated Tuesday 17 November 2020 Revision 1

Introduction

At Glanmore Foods we are committed to protecting the privacy of everyone in our community. This means that we'll protect the personal information of all visitors who access our websites or services through any platform or device (collectively, the "Services").

This privacy notice ("Privacy notice") explains how Glanmore Foods collect and use your personal information. You'll also find information about how you can exercise your privacy rights. By using our Services, you agree to Glanmore Foods using your personal information as described in this Privacy Notice. The terms "we", "us" or "our" are each intended as reference to Glanmore Foods Ltd and any terms not defined in this Privacy Notice are defined in our Terms.

Summary

We've summarised the key points of our Privacy Notice below.

1. Information we collect from you and why

Here are the broad categories of personal information that we may collect about you and the reasons why:

1. Information that you provide voluntarily:
 - Registration information when you create a Glanmore Foods account so we can:
 1. create your account so you can place Orders under our Terms
 2. identify you when you sign-in to your account;
 3. contact you for your views on our Services; and
 4. notify you of changes or updates to our Services.
 - Transaction Information when you place an Order with a School in order to:
 1. process your Order and to bill you (though note, Glanmore Foods never stores your credit card information in our systems);
 2. communicate your Order to the Schools;
 3. reply to your Order queries and questions and to resolve problems;

4. carry out analysis and research to develop and improve our Services; and
 5. protect you and the Services by seeking to detect and prevent fraud or other acts in breach of our Terms or policies relevant to the Services.
- Feedback on your views of our Services in order to:
 1. reply to your questions or queries;
 2. conduct analysis and research to improve and develop our Services.
2. Information that we collect automatically
 - Activity Information so we can:
 1. provide you with an improved experience;
 2. give you access to your Order history and preferences; and
 3. provide other services at your request.
 - Cookies and similar technologies so we can:
 1. measure and analyse the use and effectiveness of our Services;
 2. provide location services if you choose to share your geo-location.

2. Who we share personal information with:

We may share your personal information with the following recipients (and whenever we do, we will ensure that we have appropriate security and contractual safeguards in place to protect it):

1. Schools that you have placed an Order with for processing and delivery;
2. Any law enforcement or regulatory body, government agency, court or other third party where we believe disclosure is necessary under applicable law or regulations;
3. New owners or re-organised entities in the event of a business restructuring, sale, purchase or joint venture affecting our business.
4. Any other person provided that you have given your consent. We will never share your personal information unless we have your permission.

3. Legal basis for processing personal information

Glanmore Foods will always make sure we have a legal basis to collect and use your personal information. The legal basis we rely on will change depending on the type of information and the context in which we collect it.

Our main reason for collecting and using your personal information is to perform our contract with you (i.e. to make sure you get your Order when and where you want it).

4. Security

Glanmore Foods places great importance on protecting your information from and against unauthorised access and against unlawful processing, accidental loss, destruction and damage. We implement appropriate technical and organisational measures to safeguard such information.

5. Data retention

Glanmore Foods will retain your personal information for no longer than is necessary to fulfil the purposes described in this Privacy Notice. We may also retain certain elements of your personal information for a period after you delete or deactivate your account for our legitimate operations such as record keeping and to comply with our legal obligations. Whenever we retain your information we will do so in compliance with applicable laws.

6. Your data protection rights

You can access your account at any time to review and update your personal information. You can also contact us to ask us to delete your personal information, restrict its processing or request that it be ported to a third party.

7. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. We encourage you to periodically review this page for the latest information on our privacy practices.

8. How to contact us

If you have any questions or concerns about this Privacy Notice and Glanmore Foods's privacy practices, please contact:

sales@glanmorefoods.ie

More information

1. Information we collect from you and why

The personal information that we may collect about you broadly falls into the following categories:

1. Information that you provide voluntarily

Certain parts of our Services may ask you to provide personal information voluntarily.

For instance:

- *Registration information:* When you create a Glanmore Foods account, sign-up or fill in forms on the Services, we collect information about you including your name, email address and the password you create.
- *Transaction information:* We collect information relating to your Orders, including payment information (e.g. your credit card number) using the secure services of our payment processors. Payment operations are outsourced to our payment processors and we do not store your credit card information in our systems.
- *Feedback:* When you post messages and reviews of the Services or you contact us, for example with a question, problem or comment, we collect information about you including your name and the content of your query. If you contact our customer support teams, we will record and keep a record of your conversation for quality and training purposes and to aid in the resolution of your queries.
- *Sensitive Information:* We collect information that you provide when you contact us (such as through our customer service team-either phone call or email). This information may include sensitive personal information, such as health-related information (allergies or dietary requirements) or information about your religion (such as if you only eat halal food). We do not require this information, and we ask that you share this information with the School only. However, there are some situations where you may nonetheless provide this type of information, for example if you make a complaint, and in those circumstances, we will only be collecting it with your consent.

2. Information that we collect automatically

When you access our Services, we may collect certain information automatically from your device. In some countries, including countries in Europe, this information may be considered personal information under applicable data protection laws.

For instance:

- *Activity information:* We collect information about your usage of the Services and information about as well as what you search for, look at and engage with.

Our use of collected information

Examples of how we may use this information include:

3. Information that you provide voluntarily

- *Registration information*

The registration information you provide when you create a Glanmore Foods account allows us to give you access to the Services and to supply them to you under our Terms. We also use this information to authenticate your access to the Services, to contact you for your views and to notify you of important changes or updates to our Services.

- *Transaction information*

Your transaction information allows us to process your Order and send you an accurate bill. It also helps us and any school you order with contact you wherever necessary.

Glanmore Foods may contact you by email or phone to give you status updates or other information or to resolve problems with your account or Order.

We will also analyse information on completed transactions and successfully delivered Orders on the basis of data matching or statistical analysis so that we can administer, support, improve and develop our business and Services. Our analyses also help us detect and prevent fraud or other illegal activities or acts prohibited by our Terms or any policies applicable to the Services.

- *Feedback and reviews*

If you give us feedback, we will use it to reply to your questions or queries, to provide customer support and resolve any problems with your Orders or with the Services.

4. Information that we collect automatically

When you access our Services, we may collect certain information automatically from your device such as your IP address, MAC address or device ID. In some countries, including in Europe, this information may be considered personal information under applicable data protection laws.

- *Activity Information*

We enable you to access your Order history. We may also collect information about your interaction with our emails and other forms of communication.

5. Information that we obtain from third party sources

Information we collect from third-party service providers (such as Schools) to help how you engage with our Services and to provide details to support your account setup process.

2. Who we share personal information with

In delivering the Services to you, depending on the circumstances, we may share your personal information with the following entities:

1. Schools you place Orders with so that the School can process and deliver it to you.
2. If any part of our business enters into a joint venture, purchases another business or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, or new business partners or owners or their agents and advisors. In these circumstances we will always inform the relevant entities that they must only use your personal information for the purposes disclosed in this Privacy Notice.
3. Any law enforcement or regulatory body, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
4. Any other person provided that you have given your consent to the disclosure. We will not distribute or lease your personal information unless we have your permission or are required by law to do so.

3. Legal basis for processing personal information

Our legal basis for collecting and using your personal information as described above will depend on the specific context in which we collect it.

Our main reason for collecting and using your personal information is to perform our contract with you (i.e. to make sure you get your Order when you want it). However, we will also use your personal information where it is in our legitimate business interests to do so (but only if our interests are not overridden by your data protection interests or your fundamental legal rights and freedoms). In some cases, we may have a legal obligation to collect personal information from you (e.g. in the event of legal proceedings) or we might need to process it or share it with others to “protect your vital interests” or those of another person (e.g. in a case where another person’s life is in danger).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (and we’ll also explain the possible consequences of you not providing it).

Similarly, we may collect and use your personal information in reliance on our legitimate interests (or those of any third party). Relevant legitimate interests include a) to market to you or make you offers that we believe will interest you; b) to analyse and understand how our services are used and so to improve them; c) for fraud prevention or prevention of other criminal acts; or d) to keep our systems secure.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us”.

4. International data transfers

Glanmore Foods’s website server is located in the Republic of Ireland and as such complies with the Data Protection Act 2018.

5. Security

We place great importance on keeping your personal information safe and secure. As such, we put in place appropriate technical and organisational measures / industry standard technology to protect it from unauthorised access and unlawful processing, accidental loss, destruction and damage.

The security measures we use are designed to provide a level of protection security appropriate to the risk of processing your personal information. Where you have chosen a password, which allows you to access certain parts of the Services, you are responsible for keeping this password confidential. We advise you not to share your password with anyone and to use a unique password for our Services. We will not be liable for any unauthorised transactions entered into using your name and password.

6. Data retention

If you object to us processing certain categories of your personal information), we will retain a record of your objection to the processing of your information so that we can continue to respect your wishes.

We will destroy or permanently anonymise your personal information at the point that we no longer need to process it for our ongoing legitimate business needs or for any legal reason. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store it and isolate it from any further processing until deletion is possible.

7. Your data protection rights

Glanmore Foods respects your privacy and data protection rights. Below is a summary of your rights in respect of the personal information of yours which Glanmore Foods handles:

1. Glanmore Foods provides you with the tools to access, review or update your personal information at any time through your account. If you wish to request deletion of your personal information, you can do so by contacting us using the contact details provided under the “How to contact us”.
2. You can object to processing of your personal information, ask us to restrict processing of your personal information or request that it be ported to a third party. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us”.
3. If we collect and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
4. You have the right to complain to a data protection supervisory authority about our collection and use of your personal information.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

8. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

We encourage you to periodically review this page for the latest information on our privacy practices.

9. How to contact us

If you have any questions or concerns about this Privacy Notice and Glanmore Foods's privacy practices, please contact us:

By email at: Sales@Glanmorefoods.ie

By writing to us at:

Orla Howley

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