GDPR WEBSITE PRIVACY NOTICE

INTRODUCTION

Welcome to the "Mortons Flour" Privacy Notice which provides you with information on how and why we collect and process your personal data through this website.

This Privacy Notice is provided in line with the General Data Protection Regulation (GDPR) which amends and overrides existing Data Protection legislation w.e.f. 25 May 2018 and places enhanced accountability and transparency obligations on organisations when using your personal data.

The brand "Mortons Flour" is owned and produced by Andrews Flour Mills Ltd (AFML). AFML is the **controller** and responsible for this website so when we mention" Mortons Flour", "we", "us" or "our" in this privacy notice, we are referring to AFML. We respect your privacy and are committed to protecting your personal data.

Please read this Privacy Notice as it will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is issued on behalf of AFML and any changes will be posted here and, where appropriate, notified to you by email.

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below.

- 1. WHAT DATA WE COLLECT ABOUT YOU
- 2. HOW WE COLLECT YOUR PERSONAL DATA
- 3. HOW WE USE YOUR PERSONAL DATA
- 4. HOW WE SHARE YOUR PERSONAL DATA
- 5. HOW WE SECURE YOUR DATA
- 6. DATA RETENTION
- 7. YOUR LEGAL RIGHTS

1. WHAT DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, email address
- Contact Data includes first name, last name, email address and telephone numbers, and we only use this
 information to respond to your request. Contact forms go to a password protected email address until a
 query is resolved.
- **Technical Data** includes internet protocol (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.
- Usage Data includes using google analytics to collect information about your visit, such as,
 - number of people who visit the website;
 - · date and time of visits;
 - · number of pages viewed;
 - amount of time spent on the website;
 - popular sections of the website.

We also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. We do not control these third-party websites and are not responsible for their privacy statements, therefore we encourage you to read the privacy notice of every website you visit.

2. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

- <u>Direct interactions</u> You may give us your Identity and Contact Data by filling in forms or by corresponding
 with us by our online contact forms, by post, phone, email or otherwise.
- <u>Automated technologies or interactions</u> using cookies, server logs and other similar technologies, we may
 automatically collect technical data about your equipment, browsing actions and patterns. We may also
 receive technical data about you if you visit other websites employing our cookies. See link to cookie policy
 below.
- <u>Third parties or publicly available sources</u> We may receive personal data about you from various third parties, such as technical data from Google Analytics based inside and outside the EU.
- <u>People who contact us by Social Media</u>-We use a third-party provider to manage our social media interactions and store them for three months we do not share these with any other organisations.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract, we are about to enter into or have entered into with you, ie, new customer and we collect identity and contact details.
- Where it is necessary for our legitimate interests (or those of a third party) to define types of customers for our products and services and to keep our website updated and relevant; and your interests and fundamental rights do not override those interests, ie, responding to queries, using google analytics to improve our website, customer relationships and experience. We will collect technical and usage data.
- Where we need to comply with a legal or regulatory obligation.

<u>Cookies</u> - You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO OUR COOKIE POLICY.]

<u>Change of Purpose</u> - We will only use your personal data for the purposes for which we collected it - if we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. HOW WE SHARE YOUR PERSONAL DATA

We may have to share your personal data with the parties below for the purposes detailed in the table above: Within AFML

- With service providers who provide IT, Web and system administration services, as necessary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
 Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and to only process your personal data for specified purposes in accordance with our instructions.

5. HOW WE SECURE YOUR DATA

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

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, as appropriate.

6. DATA RETENTION

We will only retain your personal data 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.

In some circumstances you can ask us to delete your data: see Legal Rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you)

for research/statistical purposes in which case we may use this information indefinitely without further notice to you.

7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, namely:

- right to be informed about the processing of your personal data
- right to rectification if your personal data is inaccurate or incomplete
- right of access to your personal data and supplementary information and to confirmation that it is being processed
- **right to be forgotten** by having your personal data deleted or removed on request where there is no compelling reason for an organisation to continue to process it
- right to restrict processing of your personal data if you consider it is unlawful or inaccurate
- right to data portability of your personal data for your own purposes, ie, you can obtain and reuse
- right to object to processing of your personal data for direct marketing, scientific or historical research, or statistical purposes

If you wish to exercise any of the rights set out above, please contact us as detailed below.

No fee usually required

You will not have to pay a fee to access your personal data (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 to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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. Occasionally 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.

If you have any queries about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

Contact Details

Data Protection Officer Andrews Flour Mills Ltd 71-75 Percy Street Belfast BT13 2HW Tel: 028 9032 2451

Alternatively, click here to use our website 'contact form' to get in touch.

Should you wish to complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.