HARVEST FINE FOODS PRIVACY POLICY

LAST UPDATED: October 2026

Harvest Fine Foods ("**we**", "**us**" or "**our**") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1 IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of our websites (including www.harvestfinefoods.co.uk) (our "**Sites**"), including any data you may provide through our Sites or associated App when opening an account.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Harvest Fine Foods (Company No. 04153804) with its registered office at 814 Leigh Road, Slough SL1 4BD, is the controller and responsible for your personal data.

We have appointed a data privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy officer at enquiries@caterfoodbg.co.uk or write to the data privacy officer at 814 Leigh Road, Slough SL1 4BD.

You have the right to make a complaint at any time to the Information Commissioner (IC), 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 IC so please contact us in the first instance.

Your duty to inform us of changes

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

Third-party links

Our Site 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 their privacy statements. We encourage you to read the privacy policy of every website you visit.

2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity & Contact Data** includes name, username or similar identifier, age and/or date of birth and gender, billing address, delivery address, email address and telephone number(s).
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of goods and services you have purchased from us

- **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 our Site.

- **Usage Data** includes information about how you use our Site, goods and services purchased on our Site.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will 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. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and if you fail to provide that data 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 the contract you have with us but we will notify you if this is the case at the time.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity & Contact Data and Financial Data by signing up for an account, placing an order for goods or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - place an order for goods or services;
    - create an account on our Site (or update your account details);
    - request marketing to be sent to you;
    - enter a competition, promotion or survey; or
    - give us feedback or contact us by post, phone, email or otherwise (we will keep a copy of the correspondence).
- **Automated technologies or interactions.** As you interact with our Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by

using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and publicly available sources as set out below:

    - Technical Data from analytics providers such as Google.
    - Identity & Contact Data, Financial Data and Transaction Data from providers of technical, payment and delivery services.
    - Identity & Contact Data from publicly available sources (such as Companies House and the Electoral Register)

4 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 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 obligation.

See **Section 10 Glossary "Lawful Basis"** to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at enquiries@caterfoodbg.co.uk

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at enquiries@caterfoodbg.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	How long do we store the data for?
To register you as a new customer, set up and manage your account and to manage our relationship with you including: (a) communicating with you in relation to orders, in response to queries or complaints and in relation to surveys, market research, prize draws and/or competitions (b) notifying you about changes to our terms or privacy policy (c) asking you to take part in a survey or market research (d) enable you to take part in a prize draw, competition or complete a survey or market research	(a) Identity & Contact Data (b) Usage Data (c) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (keep our records up to date, study how customers use our goods and services, to develop them and grow our business and to promote our business, brand, goods and services)	Current year plus 6 years
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity & Contact Data (b) Financial Data (c) Transaction Data (d) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	Current year plus 6 years
To administer and protect our business and our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity & Contact Data (b) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	Current year plus 6 years
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity & Contact Data (b) Usage Data (c) Marketing and Communications Data (d) Technical Data	Necessary for our legitimate interests (to study how customers use our goods and services, to develop them, to grow our business and to inform our marketing strategy)	Current year plus 6 years

We may randomly monitor and record communications made to us, including by e-mail or telephone or use copies of your communications with us to protect the interests of our business and our customers and for staff training and quality purposes.	(a)Identity & Contact Data (b) Usage Data (c) Marketing and Communications Data (d) Technical Data	(a) Necessary for our legitimate interests (maintaining customer/ service quality standards, detection of and/ or prevention of crime and to ensure that our employees comply with legal obligations and our policies and procedures (including our customer relations practices).	Current year plus 6 years
To make suggestions and recommendations to you about goods or services (and offers) that may be of interest to you	(a) Identity & Contact Data (b) Technical Data (c) Usage Data (d) Marketing and Communications Data	Necessary for our legitimate interests (to develop our goods/services and grow our business)	Current year plus 6 years

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity & Contact Data, Technical Data and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which goods, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving such marketing communications.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by:

- contacting us at any time at: enquiries@caterfoodbg.co.uk ; or
- click unsubscribe in any email communication we send you.

Please note that our systems may take up to 14 working days to update after changing your preferences.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, warranty registration, product experience or other transactions.

Cookies

For information about the cookies we use, please see www.harvestfinefoods.co.uk

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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

5 DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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 policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 INTERNATIONAL TRANSFERS

We may sometimes need to transfer your personal data outside of the United Kingdom or the European Economic Area ("**EEA**"). For example, to other companies within our group of companies (who are based in South Africa and New Zealand) or to external third parties (who are based outside the United Kingdom or the EEA) which means that their processing of your personal data will involve a transfer of data outside the United Kingdom or the EEA.

Whenever we transfer your personal data out of the United Kingdom or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we transfer data to our group company based in New Zealand, we will do so on the basis that New Zealand has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we transfer data to our group company based in South Africa or we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

- Where we use providers based in the US, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7 DATA SECURITY

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 where we are legally required to do so.

However, as you may be aware, no data transmission over the internet can be entirely secure. As a result, while we will always use reasonable endeavours to protect your personal information, we cannot guarantee the security of your personal information and the use of our Site (including the e-mail facilities) is at your own risk.

8 DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are set out in the table above.

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

In some circumstances we will anonymise your personal data (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.

9 YOUR LEGAL RIGHTS

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

- *Request access to your personal data*
- *Request correction of your personal data*
- *Request erasure of your personal data*
- *Object to processing of your personal data*
- *Request restriction of processing your personal data*
- *Request transfer of your personal data*
- *Right to withdraw consent*

If you wish to exercise any of the rights set out above, please contact us at enquiries@caterfoodbg.co.uk or by post to the Data Privacy Officer, Bidfood, 814 Leigh Road, Slough SL1 4BD.

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 could 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 could 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.

10 GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/goods and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in our group and who are based in New Zealand and South Africa and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities.
- Third parties, where we are required to do so by the Courts or to comply with other legal, statutory and/or regulatory obligations including accounting and taxation requirements.
- Payment providers for the purpose of handling payments.
- Police, law enforcement agencies or other authorised bodies to prevent and/or detect crime.
- Data analysis or direct marketing companies for purpose of providing you with relevant advertising or marketing and/or perform services on our behalf (on an aggregated/anonymised basis).

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain goods or services to you. We will advise you if this is the case at the time you withdraw your consent.