

# PRIVACY NOTICE

## 1. Introduction

We are The Country Range Group Limited a company registered in England and Wales (Company No. 02985881) with its registered office at 4&5 Jupiter House Mercury Rise, Altham Business Park, Altham, Accrington, Lancashire, BB5 5BY (“**we**”, “**our**”, “**us**”, “**the Company**”). We are a “Data Controller” for the purposes of the General Data Protection Regulation ((EU) 2016/679) (“**GDPR**”) and Data Protection Act 2018, whilst undertaking our business services.

We are committed to protecting and respecting your privacy. This Privacy Notice applies to all users of our websites (at [www.countryrange.co.uk](http://www.countryrange.co.uk) ; [www.stiritupmagazine.co.uk](http://www.stiritupmagazine.co.uk) ; and [www.countryrangestudentchef.co.uk](http://www.countryrangestudentchef.co.uk)), (the “**Site**”), job applicants, our members, customers and chef lecturers involved with our Student Chef Challenge, and other people who interact with or do business with us (such as our suppliers and service providers). It 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, 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 goods from us, communicate with us, visit our Site 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 Site;
- Records of your correspondence with us;
- Academic and employment history, references and other information we require or you volunteer to us as part of a job application;
- Information about how you use our Site, products and services;
- Photography and video imagery;
- CCTV footage in the event you appear on CCTV installed by us.

We do not normally collect special categories of personal data from our customers or users of our Site. In the event you provide us with any special category data, as a job applicant or otherwise, we will only keep and use this information to the extent permitted by law, as detailed further below.

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

We collect your personal information through different methods including:

- Direct interactions with you by telephone, our Site, e-mail, phone or otherwise;
- Through the service that we provide to you, or that you provide to us;
- Through photography and video capture;
- By CCTV or through our fire safety signing-in book if you visit our premises;
- Automated technologies or interactions. As you interact with our Site, 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 in accordance with the law. 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 (whether an employment or a business contract);
- 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. (in which case we will carry out a legitimate interests assessment);
- 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 electronically. You have the right to withdraw consent to any 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 member, supplier or a customer;
- Where you agree, to 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 process your job application;
- To perform our contract with you, including processing payments;
- To answer any queries you send through the Site, or any other means;
- 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 operate any competitions that you have entered;
- To administer and protect the business and this Site;
- To address any complaints or legal claims; and
- To make suggestions or recommendations to you about similar goods or services that may be of interest to you.

#### If you fail to provide personal information

If you fail to provide certain personal information (or to update any personal information we are already using) when requested, or required by law, or under the terms of a contract we have with you, we may not be able to perform or enter into the relevant contract (whether employment or business). In this case, we may have to cancel your job application or a contract you have with us. We will notify you if this is the case at the time.

## 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.

## 7. 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 Site, 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. We 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. Technical details of the cookies used on the Site can be found at <http://www.countryrange.co.uk/cookies/>.

### 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. This clause should be read in conjunction with our Privacy Policy and website terms and conditions, which also appear on our Site.

For more information 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>. If you use the Site after this notification has been displayed to you and your browser is set to accept cookies, we will assume that you consent to our use of cookies and other similar technologies as described in this Privacy Policy for the purposes described in this Privacy Policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

## 8. 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 perform or enter into a contract with you or where we have another legitimate interest in doing so.

Third parties include the following:

- Our members;
- Accountants;
- IT service provider;
- Employee benefit brokers and providers (e.g. pension and insurance providers);
- Marketing and communications providers.

Our contracts with all third parties include provisions to protect your personal data. Third parties only have access to personal data necessary to perform the described purposes, and may not use it for other purposes. Third parties are also required to comply with data protection law in their own capacity and will provide you with their own privacy notices.

## 9. 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.

## 10. 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 categories of your personal information are available in our retention policy, which you can request from us by contacting us using the details shown below.

## 11. 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 our DPO, Coral Rose, using the details below. 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 our DPO, Coral Rose, using the details below. 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.

## 12. 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 ICO at the following address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

### **13. Contact us**

You can e-mail us at [coral@countryrange.co.uk](mailto:coral@countryrange.co.uk) or write to us at the following address: 4&5 Jupiter House, Altham Business Park, Altham, Lancashire, BB5 5BY.

### **14. 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 our DPO, Coral Rose, using the details above.