

Bumble Hole Foods – Privacy Notice

We at Bumble Hole Foods are committed to protecting your privacy. This Privacy Notice governs our data collection, its handling and how we use it.

Bumble Hole Foods is the controller and responsible for your personal data.

We may update this notice at any time. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

If you have any questions regarding this privacy notice or regarding how we handle the information you provide us, please contact us at bumbleholefoods.com

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by *[the General Data Protection Regulation 2016/679 (the "GDPR")¹]*.

How do we process your personal data?

Bumble Hole Foods complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Information we collect

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data**
(including your first name, maiden name, surname, username or similar identifier, marital status, title, date of birth and gender);
 - **Contact Data**
(including billing address, delivery address, email address, telephone contact numbers and social media contact information);
 - **Financial Data**
(including bank account and payment card details);
 - **Transaction Data**
(including details about payments to and from you and other details of products and services you have purchased from us);
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- **Technical Data**
(including 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 website)
- **Profile Data**
(includes purchase history, preferences, feedback and survey responses);
- **Usage Data**
(including information about how you use our website, products, and services);
- **Marketing and Communications Data**
(including your preferences in receiving marketing from us and your communication preferences);

We also collect, use and share Aggregated Data such as 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.

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 and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - Apply for our products or services;
 - Create an account on our website;
 - Subscribe to our service or publications
 - Request marketing to be sent to you;
 - Enter a competition, promotion or survey; or
 - Give us some feedback
- **Automated technologies or interactions**
As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies

Use of your data

We will only use your personal data where the data protection legislation allows us to. The data we collect and store relating to you is primarily used 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;

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text. You have the right to withdraw consent to marketing at any time by contacting us.

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.

Please 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 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
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms of privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

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

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

You will receive marketing communications from us if you have requested information from us or have given your specific and informed consent to receiving that marketing.

How long do we keep your personal data?

[We keep your personal data for no longer than reasonably necessary for a period of *[insert relevant period]* in order to *[insert sufficient reason for retaining personal data – (“just in case” it might come in useful one day, will not be a sufficient reason)]*. Examples could be: - in case of any legal claims/complaints; for safeguarding purposes etc.].