

# Privacy Notice & Cookie Policy

# **Cookie Notice**

Seafresh Group (Holdings) Limited is committed to safeguarding the privacy of our users. Seafresh Group's website does not automatically capture or store personal information, except for logging the user's IP address and session information, such as the duration of the visit and type of browser used.

Your IP address is recognised by the web server and is only used for system administration and to provide statistics that Seafresh Group may use to evaluate and improve the site.

Seafresh Group uses cookies which enables us to remember who you are the next time you visit the site.

These cookies contain data from which you cannot be identified personally, but which the web server can interpret. We do not use cookies for collecting user information from the site.

# **Privacy Notice**

This Privacy Policy is provided by Seafresh Group (Holdings) Limited ("**Seafresh**" or "**we**" or "**us**"). We are a 'controller' for the purposes of the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 (collectively the "**Data Protection Laws**"). This Privacy Policy applies to the personal data we collect through the use of our website and responding to general enquiries. We take your privacy very seriously and ask that you read this Privacy Policy carefully as it contains important information about our processing and your rights.

# HOW TO CONTACT US

If you would like this Privacy Policy in another format (for example: audio, large print, braille) please contact us at the details below:

**Email:** Using the "Contact Us" section of our website (details below) **Address:** Atlantic House, Oxleasow Road, Redditch, B98 0RE **Website:** https://www.seafresh-group.com

We may change this Privacy Policy from time to time. We will alert you on our website https://www.seafresh-group.com when changes are made.

Current version: July 2023

# WHAT PERSONAL DATA DO WE COLLECT?

*General Enquiries* - When you contact us for general enquiries we collect your name, contact details and information regarding your query.



# WHY DO WE PROCESS YOUR PERSONAL DATA?

We use your personal data for the following purposes listed in this section. We are allowed to do so on certain legal bases (please see section "HOW IS PROCESSING YOUR DATA LAWFUL" for further detail).

Personal Data processed	Purpose								Legal Basis
General Enquiries	Respond products.	to you	ir re	equest	for	information	about	our	Legitimate Interest

Furthermore, we will process your personal data for the following purposes:

- Comply with any procedures, laws and regulations which apply to us; and
- Establish, exercise or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others.

#### HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

We are allowed to process your personal data based on the following legal bases for the purposes explained in the previous section "WHY DO WE PROCESS YOUR PERSONAL DATA":

 Legitimate Interests - We are permitted to process your personal data if it is based on our 'legitimate interests' i.e. we have good, sensible, practical reasons for processing your personal data which is in our interests. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. The table in the previous section "WHY DO WE PROCESS YOUR PERSONAL DATA" explains the personal data processed on this basis.

You can object to processing that we carry out on the grounds of legitimate interests. See the section "YOUR RIGHTS" to find out how.

#### HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

The following categories of personal data will be kept for the following periods.

Data we process	How long this will be held for
General Enquiries	One month after the enquiry has been resolved



# WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

- We use external providers that act as our processors who provide typical services required by all organisations such as website development, data storage, email service providers and IT hosting. These providers process your personal data as part of the services they offer to us. We take steps to ensure that our service providers process your data in accordance with the Data Protection Laws, only use it in accordance with our contract with them and keep it secure. If you would like more information about our processors, please contact us using the details at the section "How to contact us".
- We strive to implement appropriate technical and organisational measures in order to
  protect your personal data against accidental or unlawful destruction, accidental loss
  or alteration, unauthorised disclosure or access and any other unlawful forms of
  processing. We aim to ensure that the level of security and the measures adopted to
  protect your personal data are appropriate for the risks presented by the nature and
  use of your personal data. We follow recognised industry practices for protecting our
  IT environment and physical facilities.

# YOUR RIGHTS

As a data subject, you have the following legal rights under the Data Protection Laws in relation to your personal data . You can exercise these rights free of charge, by contacting us (please see section "How to contact us"). We will respond to any rights that you exercise within a month of receiving the request unless the request is particularly complex, in which case we will respond within three months.

- 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.
- Please be aware that there are exceptions and exemptions that apply to some of these rights, which we will apply in accordance with the Data Protection Laws.

Your Data Protection Rights	What Does This Mean?
1. Right of access	You have the right to obtain access to your personal data we process and certain other information (similar to that provided in this Privacy Policy).
	To help us find the information, please give us as much information as possible about the type of personal data you would like to see.
2. Right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.



Your Data Protection Rights	What Does This Mean?
<ol> <li>Rights to ask us to stop contact you with direct marketing</li> </ol>	These rights are not applicable as we will not contact you for any marketing purposes.
4. Rights in relation to automated decision making	These rights are not applicable as we do not carry out any automated decision making.
5. Right to erasure	This is also known as the 'right to be forgotten' and enables you to request the deletion or removal of your information where:
	You do not believe that we need your data in order to process it for the purposes set out in this Privacy Policy;
	If you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;
	You object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
	Your data has been processed unlawfully or have not been erased when it should have been.
<ol> <li>Right to restrict processing</li> </ol>	You have rights to 'block' or suppress further use of your information. When processing is restricted we can still store your information, but may not use it further. You may request that we stop processing your personal data temporarily if:
	You do not think your data is accurate. We will start processing again once we have checked whether or not the data is accurate;
	The processing is unlawful but you do not want to erase your data;
	We no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
	You have objected to the processing because you believe that your interests should override our legitimate interests.



Your Data Protection Rights	What Does This Mean?
7. Right to data portability	You have rights in certain circumstances to obtain and reuse your personal data for your own purposes across different services.
<ol> <li>Right to object to processing</li> </ol>	You have the right to object to certain types of processing, including processing based on our legitimate interests and processing for direct marketing.
9. Right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (for example, by clicking "unsubscribe" at the bottom of the email newsletter).

### What if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the Data Protection Laws.

#### **Complaints to the Regulator**

It is important that you ensure you have read this Privacy Policy. If you do not think that we have processed your data in accordance with this Privacy Policy, you should let us know as soon as possible. You also have the right to complain to the Information Commissioner's Office. Information about how to do this is available on its website at www.ico.org.uk.