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## PRIVACY POLICY

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### BACKGROUND:

Source Food Stores Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.anyasway.co.uk](http://www.anyasway.co.uk) ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

### 2. Information About Us

Our Site is owned and operated by Source Food Stores Ltd, a limited company registered in England under company number 5138340.

Main trading address: 1 Brentford Business Centre; Commerce Rd; Brentford; TW8 8LG.

Representative: Jim Warner.

Email address: [jim@sourcefood.co.uk](mailto:jim@sourcefood.co.uk).

Telephone number: 020 8568 6562.

Postal address: 1 Brentford Business Centre; Commerce Rd; Brentford; TW8 8LG.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic

location data, and other online identifiers.

## **5. What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## **6. What Data Do You Collect and How?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
IP address; web browser type and version; operating system; a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.	This data is collected automatically using Google Analytics.
We collect email addresses; telephone numbers and record of what and when they ordered with us.	This data is collected manually when orders are placed via email or telephone.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Analysing the use of Our Site	Google Analytics uses your IP address to distinguish between visitors of our website. This gives us anonymous statistics about how our website is used. Please see how Google uses your data at the following address: <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>	The legal basis for this processing is our legitimate interests, enabling Us to continually improve Our Site and your user experience.
Analysing previous orders of our customers	We use the data to access what customers like and dislike. This helps us to determine the products we provide. We may also email customers with new ideas and menus. Unsubscribing is possible at any time by clicking the relevant link in any of our marketing emails.	The legal basis for this processing is our legitimate interests, enabling Us to continually improve our products and services to customers.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Anonymous analytics information including IP address; web browser type and version; operating system; a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.	Your visitor data is automatically deleted once Google identifies that you haven't been to Our Site for a period of 26 months or longer.
Customer email addresses; telephone numbers and records of what and when they ordered with us.	We keep this data for 5 years.

## 9. How and Where Do You Store or Transfer My Personal Data?

We share your data with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the [European Commission](#).

Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

## 10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply certain products or services.

Recipient	Activity Carried Out	Sector	Location
Analytics provider (Google) is a data processor.	Collects anonymised statistical data about how our website is	Technology	Google is an international organisation which complies with the EU-US Privacy Shield. For more information please visit <a href="https://support.google.com/analytics/answer/7105316">https://support.google.com/analytics/answer/7105316</a>

	used.		
Email marketing provider (Campaign Monitor) is a data processor.	Email marketing to previous customers	Technology	Campaign Monitor is an Australian organisation which use standard contractual clauses in their Data Processing Agreement to meet GDPR requirements in all of data processing locations globally. For more information, please visit <a href="https://www.campaignmonitor.com/policies/">https://www.campaignmonitor.com/policies/</a>

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. How Can I Control My Personal Data?

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our marketing emails and at the point of providing your details).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can I Withhold Information?

You may access Our Site without providing any personal data at all.

You may restrict our use of Cookies. For more information, see Part 14.

## 13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request as quickly as possible and, in any case, not more than one month after receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 14. How Do You Use Cookies?

We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our My Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	first	Google	Used to distinguish users
_gid	first	Google	Used to distinguish users
_gat_gtag_UA_23571562_2	first	Google	Used to throttle request rate.
AMP_TOKEN	first	Google	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.

Google may adjust their cookies from time to time, please visit <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#analyticsjs> to review their latest cookie details.

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

**15. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: jim@sourcefood.co.uk.

Telephone number: 020 8568 6562.

Postal Address: 1 Brentford Business Centre; Commerce Rd; Brentford; TW8 8LG.

**16. Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 16 January 2019.