

# PRIVACY POLICY

This privacy policy sets out how **LAPD FOOD** (“we”, “us” or “our”) uses and protects any information that you give us when you use this website. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy Policy.

Respecting the privacy rights of our customers is very important to us. We are committed to complying with all applicable data protection and privacy legislation in force from time to time including the UK General Data Protection Regulation; the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended (the “Data Protection Legislation”). References to “processing”, “personal data”, “processor”, “controller” and “data subject” shall bear their respective meanings given in the Data Protection Legislation.

This privacy policy explains how we collect, store and use personal data about you when you visit our websites <https://lapdfood.co.uk/>, phone, our mobile, tablet or our other applications (our “**Sites**”). This policy applies to all our Sites regardless of how they are made available to you or accessed by you.

Please read this privacy policy carefully before you start using our Sites, as this policy will apply to your use of our Sites.

If you do not want your data to be used as set out in this privacy policy, you should not use our Sites.

Your use of our Sites, including any orders you place, is governed by our Terms and Conditions of Sale and of Use and our Cookie Policy. Please take the time to read these, as they include important terms which apply to you.

## WHAT INFORMATION DO WE COLLECT AND WHY DO WE COLLECT IT?

When you visit our Sites, we may collect:

1. Information such as your browser type and version and anonymous information collected from cookies when you are browsing our Sites. We’ll also store the food that you last ordered so we can improve your reordering experience in future. We collect this information to help us understand how to improve our services and our Sites and to ensure that the content on our Sites is presented to you in an effective manner. We have a legitimate interest for this processing: to ensure that our Sites are operating effectively and to provide you with a great service. Please see below on “How long we keep your personal data for”; and
2. Personal information such as your name, address, IP address, telephone number and email address as provided by you when you register as a user, enter a competition with us, or place an order with us. We collect this information for the following reasons:
  - To process orders placed on our Sites. We collect this information to process your order. If you fail to provide us with the information that we request, then you may not be able to place an order via our Sites. This processing is necessary for the performance of a contract to which you are a party. Please see below on “How long we keep your personal data for”. We engage third party processors to process the payment of your order online. If you consent to them doing so, the third party processors may store your payment card details to speed up your transaction time the next time you order from us. If you want to change your account settings, please login to your account and follow the instructions provided;
  - For product development (for example, call backs for feedback on new products), for statistical analysis, market research, testing and survey purposes, to notify you about changes to our Sites or our services. We may also use your online browsing behaviour and your collection and delivery purchases to help us better understand you as a customer and to ensure our food and services meet your current and future needs. We have a legitimate interest to collect this information: to continue to improve

the services we provide to you. Please see below on “How long we keep your personal data for”;

- To ensure you receive marketing and offers that are of most interest and relevance to you. To help us achieve this, we may share your data with third party companies to understand your purchasing options and provide you with direct marketing, including online advertising. We have a legitimate interest to collect this information: to get to know your preferences and to personalise our offers to you to improve the marketing you receive from us. Please see below on “How long we keep your personal data for”. You can opt out of receiving this direct marketing at any time, please see below for further information;
- To send you service messages relating to order confirmations. We have a legitimate interest to collect this information to keep you updated on the status of your order. Please see below on “How long we keep your personal data for”; and
- To facilitate any competitions you may enter with us. This processing is necessary for the performance of a contract to which you are a party.

## DIRECT MARKETING

When you place an order on our Sites, we will send you occasional direct marketing via email and SMS about similar products and services. We have a legitimate interest in sending you this marketing: to promote our products and services to our customers and to make sure you are aware of the best offers and deals available. In addition, we rely on the Privacy and Electronic Communications Regulations in order to send direct marketing to our existing customers, specifically regulation 22, which allows us to send electronic marketing to you about the same or similar products you have ordered from us, as long as you are given an opportunity to opt out at the point of data collection and in every subsequent message we send to you.

### Can I stop receiving direct marketing?

Yes! We give you an opportunity to opt out of marketing at the point we collect your data by ticking the relevant boxes on the order checkout page. You are also always free to unsubscribe from direct marketing at any time; this will never have an impact on our commitment to provide you with great service and a quality product. You can unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us.

### How long do you keep me opted in for direct marketing?

We will automatically opt you out of receiving further email and sms direct marketing if you unsubscribe. If you order from us again and have not previously unsubscribed, or if you update your preferences to opt in to direct marketing, we will recommence sending marketing communications to you. Please see below on “How long we keep your personal data for”.

## WHO DO WE SHARE YOUR INFORMATION WITH?

We may share your personal information with third party companies to perform data matching, data analysis or online advertising services on our behalf, including Google, Facebook, Twitter, Snapchat, Instagram, Twilio Inc and Mail Chimp. These third parties will only be permitted to use your personal information for the purpose of performing the relevant services for us and not for any other purpose. Please see “What information do we collect and why do we collect it?” above for further information. Should you wish to object to us sharing your data with any of the above mentioned companies, please by contact us.

We may share your personal information with our third-party direct marketing companies for the purpose of sending you promotional sms and email messages and for sending you service emails or sms messages.

We may also share your personal information with a purchaser or a potential purchaser of our business. We have a legitimate interest to do this: to assist with the sale or potential sale of our business.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other legal or regulatory enforcement agency has asked us for it.

We require all third parties that we work with to treat your personal information as confidential and to fully comply with all applicable Data Protection Legislation.

## WHERE DO WE STORE YOUR PERSONAL DATA?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") pursuant to: (a) the model clauses published by the European Commission pursuant to Commission Decision C(2010) 593 Standard Contractual Clauses (Processors) and a copy of the model contract clauses is available here; or (b) the model clauses published by the European Commission pursuant to Commission Decision C 2004/915/EC Standard Contractual Clauses (Controller) and a copy of the model contract clauses is available here. Your data is treated securely and in accordance with this privacy policy.

In the event that any lawful basis were to be invalidated, we shall ensure data is transferred via an alternative, valid transfer mechanism then in existence.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our Sites and any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. All information you provide to us is stored on our secure servers. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and corporate policies to safeguard and secure the information we receive.

## HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We retain your personal data for no longer than is necessary for the purposes(s) for which it was provided. What this means in practice will vary between different types of data. When determining the relevant retention periods, we take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your personal data from our systems when it is no longer needed.

## YOUR RIGHTS

You have a right to request access to or rectification of your personal data which we hold about you. You also have a right to erase your personal data, to restrict the processing of your personal data and the right to receive your personal data that you have provided to us and to transit such personal data to another controller.

You have the right to object at any time to any processing of your personal data where our lawful basis for such processing is legitimate interests.

If you are concerned about our processing of your personal data, you have a right to make a complaint to the Information Commissioner's Office in the UK.

If you think any information we have about you is incorrect or incomplete, please write to us or email us and we will correct or update any information as soon as possible.

## LINKING

We may link to other websites which are not within our control. Once you have left our Sites, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement applicable to the website in question.

## CHANGES TO OUR PRIVACY POLICY

Any changes we make to this privacy policy will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

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