

Introduction

John West Foods Limited ("**we**" or "**us**" or "**our**") is committed to protecting and respecting your privacy. This policy (together with the terms and conditions and any other documents referred within) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us which includes use of our website www.john-west.co.uk ("**Website**"). Please read the following carefully to understand our views and practices regarding:

- the personal information we collect about you;
- what we do with your information; and
- who your information might be shared with.

For the purpose of UK data protection law which includes the General Data Protection Regulation 2016/679 ("**GDPR**") and legislation that implements the GDPR in the UK (the "**DP Laws**"), the data controller is John West Foods Limited, 1 Mann Island, Liverpool, L3 1BP (United Kingdom). This means that we are responsible for, and control the processing of, the personal data that we collect about you.

1. How we use your information

We will collect your personal information for the following purposes together with the legal bases for such processing:

Purpose	Legal Basis for Processing
<ul style="list-style-type: none">• to identify you and manage any accounts you hold with us• to customise our Website and its content to your particular preferences• to keep a record of correspondence in connection with your transactions	Performance of a contract with you or steps being taken prior to entering into a contract.
<ul style="list-style-type: none">• to conduct research, statistical analysis and behavioural analysis (including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access)• to notify you of any changes to our Website or to our services that may affect you• to improve our products and services• to ask you to complete surveys that we use for research purposes, although you do not have to respond to them	We have a legitimate interest in undertaking this activity because it will help improve the services that we deliver to you and other customers.
<ul style="list-style-type: none">• if you agree, to let you know about other products or services that may be of interest to you—see '<i>Marketing</i>' section below• to participate in competitions and promotions;	Consent or legitimate interests to promote our services to you (as applicable – see below.)
<ul style="list-style-type: none">• to detect and prevent fraud• carry out security vetting	Compliance with legal obligations to which we are subject to.
<ul style="list-style-type: none">• to consider job applications which are received through our Website	We have a legitimate interest in undertaking this activity to allow us to receive job applications to employ individuals into our business. Performance of a contract with you or steps being taken prior to entering into a contract.

2. Marketing

We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise our Website according to your interests.

We will only send you marketing messages when you tick the relevant boxes on any form requiring consent, when you provide us with your personal information, and you can opt out at any time by unsubscribing from our marketing messages at the bottom of our marketing communication. Please see *'The right to ask us to stop contacting you with direct marketing'* below for further information.

3. Collection of information

We may collect and process the following data about you:

- information that you provide by filling in forms on our Website, this includes information provided at the time of registering to use our Website, subscribing to the service, posting material or requesting further services;
- when you enter a competition or promotion sponsored by us, and when you report a problem with our Website;
- if we keep a record of correspondences;
- if we ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- with your details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.

We may collect the following personal information:

- full name;
- postal address;
- email address; and
- telephone numbers;
- salutation;
- information you provide to us at your own option on our Website .

Please note that we do not collect any information in relation to your payment information, such as credit/debit card details.

4. IP addresses and Cookie Policy

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about its users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and to deliver a better and more personalized service. They enable us to:

- estimate our audience size and usage pattern;
- store information about your preferences, and so allow us to customize our Website according to your individual interests;
- speed up your searches;
- recognize you when you return to our Website.

In some cases we will need your consent in order to use cookies on our Website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

If you visit our Website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this cookie 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.

Types of cookies

We use two types of cookies on our Website:

- **Session Cookies** - These are temporary cookies which only exist in the period you access our Website (or more strictly, until you close the browser after accessing our Website). Session cookies help our Website remember what you chose on the previous page, thereby avoiding having to re-enter information.
- **Persistent Cookies** - These are cookies which remain on your device after you have visited our Website. These cookies help us to identify you as a unique visitor (by storing a randomly generated number). The length of time a cookie will remain on your device will depend on the type of cookie. On our Website, these cookies do not contain personal information, and cannot be used to identify you.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, the system will issue cookies when you log on to our Website. For further information about 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/>

5. Storage of your personal data

We shall retain your information for the following timescales:

- complaints and queries are held for the length of the product life and then an additional two years, with the maximum retention six years;
- marketing data will be held until you unsubscribe;
- job applications will be held for up to one year (save for when an individual has asked for us to remove the application or have been offered a position in our business).

unless we are required by law to retain your personal information for a longer period.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on its secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, it cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, it will use strict procedures and security features to try to prevent unauthorized access.

To protect your information, we have policies and procedures in place to make sure that only authorized personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have the necessary security measures in place. To accomplish this, all employees, contractors and sub-contractors have roles and responsibilities defined in those policies and procedures.

To make sure all employees, contractors and sub-contractors understand these responsibilities they are provided with the necessary training and resources they need.

In addition to these operational measures, we also use a range of technologies and security systems to reinforce the policies.

To make sure that these measures are suitable, vulnerability tests are run regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled. Additionally, all areas of the

organisation are constantly monitored and measured to identify problems and issues before they arise.

6. Uses made of the information and sharing data with third parties

We use the information held about you in the following ways, to:

- ensure that content from our Website is presented in the most effective manner for you and for your computer;
- provide you with information, products or services that you request from us or which it feel may interest you, where you have consented to be contacted for such purposes;
- carry out its obligations arising from any contracts entered into between you and us;
- allow you to participate in interactive features of the service, when you choose to do so;
- notify you about changes to the service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we may contact you about these by post or telephone. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

Sharing your information to third parties

Where necessary to fulfil our obligations to you, John West Foods Limited may pass your details to third parties where this is necessary for the functioning of our product. These third parties include:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the terms and conditions and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Our Website may, from time to time, contain links to and from our Websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7. Your rights

Data protection laws provide you with a number of rights which are explained below. If you wish to exercise any of these rights, please get in touch using the "Contact" details noted below. In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

- The right to access information we hold about you - At any point you can contact us to request that the information we hold about you as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will respond within 30 days.
- The right to correct and update the information we hold about you - If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.
- The right to have your information erased - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

- The right to object to processing of your data - You have the right to request that John West Foods Limited stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.
- The right to ask us to stop contacting you with direct marketing - You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.
- The right to data portability - You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.
- The right to complain - You can make a complaint to us via our details below or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.
- Consent - In those cases where we need your consent to hold your information, we will ask you to check a box on any form requiring consent. By checking these boxes you are stating that you have been informed as to why John West Foods Limited is collecting the information, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject.

8. Enquiries

When contacted with an enquiry, John West Foods Limited will hold the entity name and contact details only for the purposes of handling the enquiry.

The online forms are subject to the same cookies and tracking as the rest of our Website (see the above section "*IP addresses and Cookie Policy*" for more information).

Calls made to us may be recorded to protect the interests of all parties. Call records are deleted after 90 days unless needed for ongoing actions.

9. Transfer out of European Economic Area

We may need to transfer your personal data to Singapore and Hong Kong which are located outside the European Economic Area, for the purpose of our internal IT infrastructure relating to the location of our data servers held by our parent company, Thai Union Group PCL. Any transfer of your data will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

10. Contact

Any queries regarding this privacy policy, requests for further information or if you wish to lodge a complaint should be addressed to

Jennie Detheridge

Address John West Foods Limited, No. 1 Mann Island, Liverpool L3 1BP

Email Jw_gdpr@thaiunion.com

11. Changes to our privacy policy

We may change this privacy policy from time to time. Any changes we may make to the privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access our Website.