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# Impact Food Group Privacy Notice

#### Data we collect and how we collect it

At Impact Food Group, we collect data directly from individuals, and we never purchase or acquire data outside of the public domain. We collect, process and store data of employees, prospective employees, partners, clients of Impact Food Group, prospective clients of Impact Food Group, parent data & their children's data and 3<sup>rd</sup> party suppliers.

We collect and process special category data concerning health records to provide meals to children with certain allergies. We also collect special category data to contract with our employees and prospective employees.

Data we collect for employment purposes can be found within our employee contracts and complete data protection policy.

- Parents of children = the parents of children who attend a supported Impact Food Group school
- Children = children who attend a supported Impact Food Group school
- Clients of Impact Food Group = schools who Impact Food Group provide school meals to
- Prospective Clients of Impact Food Group = schools who Impact Food Group provide may provide school meals to in the future
- 3<sup>rd</sup> Parties = suppliers of goods or services to Impact Food Group
- Employee = someone who works for Impact Food Group
- Prospective employee = someone who has applied for or has been approached directly by Impact Food Group for a vacant job role



## Your Privacy Choices and Rights

#### Your choices

You can choose not to provide us with personal data. If you decide to do this, you can continue to use the Impact Food Group website(s) and browse its pages.

If you turn off cookies, you can continue to use the Impact Food Group website(s) and browse its pages, although some functionality will be unavailable. You can block cookies by activating a setting on our cookie banner, allowing you to refuse cookies. You can also delete cookies through your browser settings. See the cookie section below for further detail.

You can opt out of marketing by clicking the unsubscribe option in any marketing communications.

### Your rights

You can exercise your rights by sending us an email at: <a href="mailto:dpo@impactfood.co.uk">dpo@impactfood.co.uk</a>

You have the right to access the information we hold about you. This includes the right to ask us supplementary information about:

- the categories of data we're processing
- the purposes of data processing
- the categories of third parties to whom the data may be disclosed
- how long the data will be stored (or the criteria used to determine that period)
- your other rights regarding our use of your data

We will provide you with the information within one month of your request unless doing so would adversely affect the rights and freedoms of others (e.g. another person's confidentiality or intellectual property rights). We'll tell you if we can't meet your request for that reason.

You have the right to make us correct any inaccurate personal data about you.

You can object to us using your data for profiling purposes or making automated decisions about you.



We will use your data to determine whether we should let you know information relevant to you (for example, tailoring emails or social media advertising to you based on your behaviour).

Where applicable, you have the right to port your data to another service. We will give you a copy of your data in CSV format so that you can provide it to another service.

If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.

You have the right to be 'forgotten' by us. You can do this by asking us to erase any personal data we hold about you if it is no longer necessary for us to keep the data for your relationship with Impact Food Group or any other law.

You have the right to complain about our use of your data. Please tell us first so we have a chance to address your concerns. If we fail in this, you can handle any complaint to the UK Information Commissioner's Office, either by calling their <a href="helpline">helpline</a> or as directed on their website at <a href="hww.ico.org.uk">www.ico.org.uk</a>.

These rights apply to all of the data categories listed in the 'Data we collect and how we collect it' section

## Security

We do everything we can to ensure the security of your data.

In today's data driven and connected world, the security of your data is more critical than ever. We recognise this and have implemented security to keep your data safe.

Security measures include; regular penetration testing, patch management, and multi-factor authentication to access critical systems. We also implement strict access controls to all essential systems and applications.

All staff are bound by confidentiality and will never disclose or share your data unless authorised to do so.



# Impact Food Group's data protection role

Impact Food Group is a controller concerning your data. As a controller, we use 3<sup>rd</sup> parties to process data. Please see below in the 3<sup>rd</sup> parties section.

# Where is your data stored?

Like most companies Impact Food Group utilises 3<sup>rd</sup> parties to provide services and store data. A list of the 3<sup>rd</sup> parties who process personal data is listed below.

These 3<sup>rd</sup> parties will be based in the UK, EEA and some cases outside of the UK and EEA.

Impact Food Group conducts thorough reviews of all of its 3<sup>rd</sup> parties, including data protection agreements, to ensure that every possible safeguard is in place and that the data is secure. Should there be a possibility that data could be exposed to a high level of risk, a Data Protection Impact Assessment will be completed and will be available upon request.



# 3<sup>rd</sup> parties

Impact Food Group works with several  $3^{\rm rd}$  parties to offer our services, most of which do not process your data in any way. Below is a list of those who have access to or process your data and a brief description of what they do.

3 <sup>rd</sup> Party	Brief Description
Access HR	Human Resources software to store and process employee data
CIVICA	Cashless till providers
Cunningham's	Till providers
Google	Analytics via cookie/pixel information
FaIT UK Limited	IT support
ForBrains	A platform to store and process children's data for Impact Food Group to be made aware of allergy information, for example
Grey Goose HR	Human Resources software
Mailchimp	The platform Impact Food Group uses to send marketing
Parent Pay	A platform parents use to add funds to their children's accounts to pay for school meals
Kanpla/Pebble	A platform to store and process children's data for Impact Food Group to be made aware of allergy information, for example



## Marketing

Where you have consented to marketing or where Impact Food Group has a legitimate interest, we will send you marketing concerning our services.

These messages will be Impact Food Group specific. We do not sell your data or share it with other companies for advertising purposes. Your data is used only to promote Impact Food Group services.

Our marketing messages are sent via Mailchimp, a specialist marketing tool. You can opt out of marketing at any time by clicking the unsubscribe link in your emails and messages or by contacting us directly.

There will be occasions when Impact Food Group sends administrative messages. These messages are not deemed marketing and cannot be opted out of.

Marketing and administration emails that you receive from Impact Food Group will contain a tracking pixel. This pixel lets us know things such as our email campaigns' open rates and click rates.

The pixel also lets us know if an email has not been delivered to update our records and keep them current.

When we analyse the data, we do so from an aggregated perspective, meaning that we report upon an overall number of open rates and click rates.

We use Mailchimp to send our marketing and administration emails, and you can find out more about how Mailchimp secures your data by following this link: <a href="https://mailchimp.com/legal/">https://mailchimp.com/legal/</a>

## Payment processing

Impact Food Group does not collect parent payment details or process them in any way. Payment taken within Parent Pay, for example, will never be shared with Impact Food Group, and we do not have access to this data.



## How long is your data stored?

Once per year, we perform a complete cleanse of data to ensure that we only process the data of those individuals who have an ongoing and active relationship with Impact Food Group.

As part of our Record of Processing Activities, we have defined the length of time we store all of our data. Should your data be due for deletion, it will be erased during the yearly data cleanse.

To understand data retention concerning your data, please feel free to contact us at: <a href="mailto:dpo@impactfood.co.uk">dpo@impactfood.co.uk</a>

### Cookies

To further improve your browsing experience, we store information about you using cookies which are files sent by us to your computer or other access devices which we can access when you visit our site at some point in the future.

We use several different cookies on our site. If you do not know what cookies are or how to control or delete them, we recommend that you visit <a href="http://www.aboutcookies.org">http://www.aboutcookies.org</a> for detailed guidance.

There are four main types of cookies we store – here's how and why we use them.

- (1) Site functionality cookies (necessary) these cookies allow you to navigate the site and use our features.
- (2) Site analytics cookies allow us to measure and analyse how our visitors use the site to improve both its functionality and your browsing experience.
- (3) Customer preference cookies when you are browsing the Impact Food Group site, these cookies will remember your preferences (like your language or location), so we can make your browsing experience as seamless as possible and more personal to you.
- (4) Targeting or advertising cookies these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

You can manage your cookie preferences via the cookie banner.



#### **First Party Cookies**

These are cookies that are set by this website directly.

If these are disabled, then various functionality on the site will be broken or unavailable.

#### **Third Party Cookies**

Our website will also use a website recording service that may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Data collected by this service is used to improve our website usability. The information collected is stored and is used for aggregated and statistical reporting and is not shared with anybody else.

#### **Governing Law**

The terms and conditions shall be governed by and construed per the laws of England, and you irrevocably submit to the exclusive jurisdiction of the courts of England and Wales.

We use several different cookies on our site. If you do not know what cookies are or how to control or delete them, we recommend that you visit http://www.aboutcookies.org for detailed guidance.

#### Further Information:

More information on session cookies and what they are used for can be found here, <u>All About Cookies</u>

To view a list of the cookies present when browsing our site, you can right click within the browser page, click inspect and then click application.

### **Breaches**

Should a breach of your data occur that is likely to result in harm to the rights and freedoms of an individual or group of individuals, Impact Food Group will notify those involved within 72 hours along with the ICO, where applicable.



### Additional information

Impact Food Group has appointed a statutory Data Protection Officer. This role will oversee all data protection operations that Impact Food Group undertakes and reports directly to the board of directors.

The role of Data Protection Officer is given to an independent individual who has no additional role(s) within the company or its group.

The DPO can be contacted at: <a href="mailto:dpo@impactfood.co.uk">dpo@impactfood.co.uk</a>

A Record of Processing Activities (ROPA), in which the lawful basis for processing all of Impact Food Group data in the UK and EU is listed and maintained. Wherever Legitimate Interests is relied upon, an impact assessment has been performed and is available upon request to those whose data is included.

Impact Food Group does not supply goods or services to individuals outside of the UK and, as such, is not required to appoint an EU representative to comply with article 27 of the GDPR.

This notice will be reviewed at least once per year. The next review is scheduled for August 2025.

If you would like to speak to a human concerning your data, please feel free to email us at: <a href="mailto:dpo@impactfood.co.uk">dpo@impactfood.co.uk</a>, and we will be happy to talk further.