

C.T. HOLMES & CO. LIMITED

Data protection privacy policy

This policy explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you: a) for customers, during the time we provide our products and services to you and after we cease to provide such products and services; and b) for suppliers, during the time we are supplied products or services by you and after we ceased to be supplied products or services from you. We are required to notify you of this information under data protection legislation. Please ensure that you read this policy (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

1. WHO COLLECTS THE INFORMATION?

C. T. Holmes & Co. Limited is the controller and responsible for your personal data (collectively referred to as the **Company**, "**we**", "**us**" or "**our**" in this privacy policy).

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact please contact us in writing, by email or telephone using the details shown in paragraph 9 below.

We will comply with the data protection principles when gathering and using personal information.

2. ABOUT THE INFORMATION WE COLLECT AND HOLD

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the table set out in the Schedule.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. DISCLOSURES OF YOUR PERSONAL DATA

As outlined in the table in the Schedule, we may need to share your personal data with third parties, examples of which are listed below:

- 3.1 Internal third parties, being other group companies acting as joint controllers or processors.
- 3.2 External third parties as follows:
 - 3.2.1 Service providers who provide IT and system administration services.
 - 3.2.2 Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - 3.2.3 HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- 3.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. INTERNATIONAL TRANSFERS OF INFORMATION

We do not ordinarily transfer your personal data outside the European Economic Area (EEA).

However, if we do need to transfer your personal data out of the EEA, we will ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data, as required by the Data Protection Act 2018 and the provisions of Regulation (EU) 2016/679, including requiring the transferee to enter into model contractual clauses or (if US based) being a member of the Privacy Shield.

If we ever transfer your personal data outside the EEA you can ask us for a copy of relevant safeguards.

Whenever we transfer your personal data out of the EEA, we will ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data, as required by the Data Protection Act 2018 and the provisions of Regulation (EU) 2016/679, including requiring the transferee to enter into model contractual clauses or (if US based) being a member of the Privacy Shield.

If we transfer your personal data outside the EEA you can ask us for a copy of relevant safeguards.

5. WHERE INFORMATION MAY BE HELD

Information may be held at our offices and third party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

6. HOW LONG WE KEEP YOUR INFORMATION

We keep your information during and after your custom with us for no longer than is necessary for the purposes for which the personal information is processed, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

7. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

Your rights in connection with personal information

7.1 Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact in writing, by email or telephone using the details shown in paragraph 9 below.

No fee usually required

- 7.2 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

- 7.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure we take to ensure that personal information is not disclosed to any person who has no right to receive it.

8. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 1 December 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

9. COOKIES

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies, however in a few cases some of our website features may not function as a result.

This website may use Google Analytics to help analyse how users use the site. Google Analytics cookies collect standard Internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitor's use of the website and to compile statistical reports on website activity.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source, unless you explicitly submit that information via a fill-in form on our website.

10. CONTACTS & COMPLAINTS

If you have any questions about how we treat and protect your personal data and your privacy, if you have any comments, wish to seek to exercise any of your rights as outlined above or to complain, please contact C. T. Holmes & Co. Limited at Office 46 New Billingsgate Market, Trafalgar Way, London, United Kingdom, E14 5ST or by email sales@holmesseafood.co.uk for the attention of Data Protection Officer.

We hope that we can resolve any query or concern you raise about our use of your information. If not, you may contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Schedule

About the information we collect and hold

| The information we collect | How we collect the information | Why we collect the information | How we use and may share the information |
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| Identity data including first name, maiden name, last name or similar identifier, marital status, title, date of birth, employment information and gender. | From you | <p>To enter into/perform our contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a customer or supplier and that we are able to perform our obligations under our contract with you on an on-going basis</p> <p>Where we need to comply with a legal or regulatory obligation</p> | To enter into/perform our contract with you |
| Contact data, including addresses, email addresses and telephone numbers. | <p>From you</p> <p>From selected third parties such as data brokers or aggregators</p> <p>From publicly available sources such as Companies House and the Electoral Register</p> | <p>To enter into/perform our contract with you</p> <p>Legitimate interest: to ensure that you are properly identified as a customer or supplier and that we are able to perform our obligations under our contract with you on an on-going basis</p> | To enter into/perform our contract with you |
| Financial data including bank account details, billing information, payment card details and credit history, information to enable us to undertake credit or other financial checks on you | <p>From you</p> <p>From selected third parties including credit reference agencies</p> | <p>To enter into/perform our contract with you</p> <p>Legitimate interest: to establish your ability to make payments to us under our contract with you, and to obtain such payments</p> | <p>To enter into/perform our contract with you</p> <p>To establish your ability to make payments to us and to obtain such payments</p> |
| Contract and transaction data including details about payments to and from you and other details of products and services you have purchased from us, contact history, purchase history, saved items | <p>From you</p> <p>Automatically from our information technology systems and our customer relationship management software</p> <p>From providers of technical payment and delivery services</p> | <p>To enter into/perform our contract with you</p> <p>Legitimate interest: to keep our records up to date</p> <p>Legitimate interest: to monitor how customers use our products and services for the purposes of business management and planning and to identify whether any other products or services may be of interest to you</p> | <p>To enter into/perform our contract with you</p> <p>To keep our records up to date</p> <p>For business management and planning</p> <p>To identify future customer demand</p> |

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| Your family, friends and other contacts' identity data including first name, maiden name, last name or similar identifier, marital status, title, date of birth and gender, and contact data, including addresses, email addresses | From you | To enter into/perform our contract with you Legitimate interest: To ensure we are able to comply with our obligations under our contract with you if we are unable to communicate with you directly provided that this does not affect your/their interests, rights and freedom | To enter into/perform our contract with you |
| Information involving feedback, questions and complaints received by us from you in relation to our products and services and your responses to surveys, competitions and promotions | From you | To enter into/perform our contract with you Legitimate interest: to maintain accurate records and to comply with legal, regulatory and corporate governance obligations and good practice | To perform our contract with you To maintain accurate records and to comply with legal, regulatory and corporate governance obligations and good practice |
| Profile data, including your username and password, location, purchases or orders made by you, your interests, preferences, feedback and survey responses, personal or professional interests, information from accounts you link to us e.g. Facebook | From you Automatically as you interact with our websites by using cookies, server logs and other similar technologies. We may also receive this data about you if you visit other websites employing our cookies | Legitimate interest: to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy | To define types of customers for our products and services, to keep our website/records updated and relevant, to develop our business and to inform our marketing strategy To study how customers use our products/services We may share this information with selected third parties, including our information technology and marketing advisers |
| Usage data, including information about how you use our websites, products and services | From you Automatically as you interact with our websites by using cookies, server logs and other similar technologies. We may also receive this data about you if you visit other websites employing our cookies | Legitimate interest: to ensure that our websites are user friendly and work for you and other customers Legitimate interest: to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy | To ensure that our websites are user friendly and work for you and other customers To define types of customers for our products and services, to keep our website/records updated and relevant, to develop our business and to inform our marketing strategy We may share this information with selected third parties, including our marketing advisers |

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| Marketing and communications data, including your preferences in receiving marketing from us and our third parties and your communication preferences | From you | Legitimate interest: to keep our records up to date and to understand how you wish for us to communicate with you | <p>To enter into/perform our contract with you</p> <p>To keep our records up to date and to understand how you wish for us to communicate with you</p> |
| If you enter our premises, your image may be stored in our systems for a period. | From CCTV footage | <p>Legitimate interest:</p> <p>(a)to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;</p> <p>(b)for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;</p> <p>(c)to support law enforcement bodies in the prevention, detection and prosecution of crime;</p> <p>(d)to assist in day-to-day management, including ensuring the health and safety of staff and others.</p> | <p>To assist law enforcement bodies and to provide a safe working environment.</p> <p>We will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security.</p> |