

Campbell
BROTHERS
PRIVACY POLICY

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1. ABOUT US

- 1.1 Campbell Brothers Limited is a company registered in Scotland with company number SC123529, whose registered office address is at Unit 4 Sherwood Industrial, Estate, Bonnyrigg, Midlothian, EH19 3LW ("**Campbell Brothers**", "**we**", "**our**" and "**us**") and is a specialist supplier of fresh meat, fish and produce to the catering industry.
- 1.2 Campbell Brothers is committed to protecting your personal information. This Privacy Policy sets out how we use and keep secure personal information provided by you. It applies whenever we collect your personal data (including when you use our websites and digital platforms). We highly recommend that you read through the terms of this Privacy Policy carefully.

2. ABOUT THIS PRIVACY POLICY

- 2.1 This Privacy Policy explains what personal information we may collect about you, how we may use it and the steps we take to ensure that it is kept secure. It also explains your rights in respect of your personal data.
- 2.2 Please note that our websites and other digital platforms may contain links to third party websites and digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own websites and digital platforms. We recommend that you check the privacy and security policies and procedures of third party websites and digital platforms that you visit.
- 2.3 We aim to continually improve our standards. Our policies and procedures are therefore constantly under review and subject to change. We recommend that you check this page from time to time in order to review the latest version of this Privacy Policy.
- 2.4 All personal information that we collect about you will be recorded, used and protected by us in accordance with applicable data protection legislation and this Privacy Policy.

Customers

3. USE OF INFORMATION

- 3.1 We may supplement the information that you provide with other information that we obtain from our other businesses but also other organisations such as Companies House, credit reference agencies and trade referees.
- 3.2 In broad terms, we use your data for the following purposes:
- 3.2.1 to administer and provide products and / or services you request or have expressed an interest in;
 - 3.2.2 to administer any competitions or other offers/promotions which you enter into;
 - 3.2.3 to let you know if any products or services you have requested are unavailable and about possible alternatives;
 - 3.2.4 for record keeping purposes;
 - 3.2.5 to carry out market research so that we can improve the products and services we offer;

- 3.2.6 to track your activity on our websites and digital platforms;
 - 3.2.7 to create an individual profile for you so that we can understand and respect your preferences;
 - 3.2.8 to use, personalise and improve your experience on our websites and digital platforms;
 - 3.2.9 to personalise any communications that we use to contact you;
 - 3.2.10 for profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us; and
 - 3.2.11 in order to prevent fraud.
- 3.3 When we provide you with products and / or services we may collect and store any personal information that you provide to us (excluding any payment card details). We may, for example, keep a record of your name, address, delivery address, email address, telephone number and bank account details where you choose to pay by direct debit. We may also record details of any disability or health needs you have at the time of booking an event or service at any of our premises in order to help ensure your comfort and safety.
- 3.4 When you sign up with us for an online account, register to receive marketing communications from us, enter one of our competitions, fill in one of our forms or otherwise expressly provide us with your personal information, we may collect and store any personal information that you provide to us and may use it to personalise and improve your experience on our websites and digital platforms, provide you with products and services you request from us and carry out profiling and market research.
- 3.5 When you interact with our websites and digital platforms, we may also automatically collect the information set out below about your visit. This is primarily to help us better understand how our customers use our websites and digital platforms to enable us create better content and more relevant communications about:
- 3.5.1 the internet protocol (“IP”) address you have used;
 - 3.5.2 your browser type, versions and plug-ins and operating system;
 - 3.5.3 your subscription status;
 - 3.5.4 how you have reached our websites and digital platforms;
 - 3.5.5 your online journey including page interaction information such as links you find interesting and searches you made;
 - 3.5.6 the pop up and push messages you have responded to;
 - 3.5.7 the advertisements you have responded to;
 - 3.5.8 the content you like or share;
 - 3.5.9 videos you have watched; and
 - 3.5.10 information collected in any forms that you complete.
- 3.6 We may also infer your country of location from the IP address you have used to access our digital platforms and we may analyse which marketing activity led to your taking specific action on our websites and digital platforms, for example in respect of downloading our app.

4. COMMUNICATIONS FROM US

- 4.1 We want you to be the first to know about our monthly market or other reports, seasonality information, specials, new product information, advice & availability information, invitations to events, food news, special and occasional offers. If you haven’t already signed up to receive these exciting benefits please visit our website to sign up. You can unsubscribe by clicking the ‘unsubscribe link’ in our marketing emails, or by contacting us using the email address on our website. Please note, if you don’t choose to receive this information, we will be unable to keep

you informed of new services, products, events or special offers that may interest you and our ability to help you take advantage of these may be hampered. If you express an interest in an offer from any of our other businesses, they may let us know.

- 4.2 We may also participate in Facebook's 'Custom Audience' service from time to time. This service enables Campbell Brothers to display to you personalised advertisements when you visit Facebook's social media platforms. It works by converting your email address to a unique number that Facebook uses to match to unique numbers that Facebook generates from email addresses of its users. Where we use Facebook Custom Audiences, we will only include you if you have consented to receive marketing from us. If you have given us your consent, you can change your mind at any time by unsubscribing or by adjusting your preferences in the preference centre.

5. COOKIES

- 5.1 In common with many other website operators, we use standard technology called "Cookies" on our website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate a website on each visit.
- 5.2 For further, more detailed information on how we use cookies, please refer to our Cookie Policy which is available to view on our website.

Suppliers

6. USE OF INFORMATION

- 6.1 In broad terms, we use your data for the following purposes:
- 6.1.1 to enquire about, and purchase, products and / or services;
 - 6.1.2 for record keeping purposes;
 - 6.1.3 to personalise any communications that we use to contact you; and
 - 6.1.4 in order to prevent fraud.
- 6.2 When you provide us with products and / or services, we may collect and store personal contact information that you have provided to us. We may, for example, keep a record of contact names, email addresses and telephone numbers.

Customers & Suppliers

7. LEGAL BASIS FOR PROCESSING PERSONAL DATA

- 7.1 Campbell Brothers collects and uses customer and supplier personal data because it is necessary for:
- 7.1.1 the pursuit of our legitimate interests (as set out at clause **Error! Reference source not found.**);
 - 7.1.2 the purposes of complying with our duties and exercising our rights under a contract for the sale of goods and / or services to a customer or the purchase of goods and / or services from a supplier; or
 - 7.1.3 complying with our legal obligations.

- 7.2 In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to customers via email or text message.
- 7.3 Customers have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.
- 7.4 The normal legal basis for processing customer and supplier data is that it is necessary for the legitimate interests of Campbell Brothers including:
- 7.4.1 selling and supplying goods and / or services to our customers;
 - 7.4.2 buying and receiving goods and / or services from our suppliers;
 - 7.4.3 protecting customers, suppliers, employees and other individuals and maintaining their safety, health and welfare;
 - 7.4.4 promoting, marketing and advertising our products and services;
 - 7.4.5 sending promotional communications which are relevant and tailored to individual customers;
 - 7.4.6 understanding our customers' behaviour, activities, preferences and needs;
 - 7.4.7 improving existing products and services and developing new products and services;
 - 7.4.8 complying with our legal and regulatory obligations;
 - 7.4.9 preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
 - 7.4.10 handling customer and supplier contacts, queries, complaints or disputes;
 - 7.4.11 managing insurance claims;
 - 7.4.12 protecting Campbell Brothers, its employees, customers and suppliers by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Campbell Brothers;
 - 7.4.13 effectively handling any legal claims or regulatory enforcement actions taken against Campbell Brothers; and
 - 7.4.14 fulfilling our duties to our customers, suppliers, staff, shareholders and other stakeholders.

8. DISCLOSURE OF YOUR INFORMATION

- 8.1 In order to fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, fraud prevention and screening, credit risk management companies and mail services.
- 8.2 We may share customer data with advertising networks and social media platforms for the purposes of selecting and serving relevant advertisements to you via those networks and social media platforms, search engine providers and analytics providers.
- 8.3 We may share your data with third parties:
- 8.3.1 if it is necessary to do so in order to enforce our contractual rights;
 - 8.3.2 if we are under a legal or regulatory duty to do so;
 - 8.3.3 where disclosure is necessary to protect the safety or security of any persons; and/or
 - 8.3.4 to lawfully assist the police or security services with the prevention and detection of criminal activity;
 - 8.3.5 otherwise as permitted under applicable law.
- 8.4 We may share customer data with our other businesses within our company group known as Bidfresh (as may change from time to time) but we will only do this if you have consented to

receive marketing relating to those other businesses or if one of the conditions in the paragraph above applies. For a full and up-to-date list of Bidfresh businesses, please visit <https://www.bidfresh.co.uk/our-businesses.html>.

- 8.5 Some of the organisations to which we may disclose your personal information are situated outside of the United Kingdom and European Union in countries which may not have laws that protect privacy rights as extensively as in the United Kingdom. If we do transfer your personal information to other territories, we will take proper steps to ensure that your information is protected in accordance with this Privacy Policy.
- 8.6 In all instances where we disclose your information to third parties, we will ensure that your information is appropriately protected.

9. SECURITY

- 9.1 We take the security of your personal information very seriously. We have security procedures in place to protect any paper based systems and computerised databases from loss and misuse, and only allow restricted access to them where necessary. Any use of personal information is carried out under strict guidelines.
- 9.2 Any customer credit card details we use in order to receive payment via Worldpay, shall be dealt with in accordance with our Information Security Policy.
- 9.3 Where a password is required to access certain areas of our websites or digital platforms, you must keep your password secure and treat it as highly confidential. Please do not share or disclose your password to anybody.

10. CHANGING YOUR PERSONAL INFORMATION

- 10.1 If you have any questions about this Privacy Policy or about your personal data, please email us at dataprotection@bidfresh.co.uk or write to us at F.A.O. The Data Protection Manager, Bidfresh Legal Department, C/o Oliver Kay, Produce House, Britannia Way, BL2 2HH.
- 10.2 You may correct or update your personal information at any time by emailing us at dataprotection@bidfresh.co.uk or where appropriate, by changing your profile on our websites and digital platforms. Please include your name, address and email address when you contact us as this helps us to ensure that we accept amendments only from the correct person. We encourage you to promptly update your personal information if it changes.
- 10.3 We will securely retain your information for as long as is reasonably necessary and in accordance with applicable law. If you wish to submit a request that your data be deleted, please write to us at the above address. You have the right to receive a copy of the personal information that we hold about you. Please write to us at the address above if you wish to exercise this right.

11. MONITORING

- 11.1 We may monitor or record telephone calls for security purposes to improve the quality of services that we provide to you.
- 11.2 Please note that for your safety and security, CCTV is in operation in all of our premises which the public have access to.

12. COMPLAINTS

If you have a complaint regarding any aspect of your personal data or this Privacy Policy, please write to us at the address set out in clause 10.1. If you are still not satisfied with the outcome of your complaint, you may contact the Information Commissioner's Office by post at The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire,

SK9 5AF or by email using their online form which can be accessed here:
<https://ico.org.uk/global/contact-us/email>.