

# Privacy Policy

'WeAreFoodiependent' is a trading name of 'Employtec'.

*Employtec ('WeAreFoodiependent' 'we' 'us' 'our') is the data processor in relation to the data collected about you. The individual shop that you purchase from is the data controller. They will have their own privacy policy that is accessible through their individual shop front page. We care about your privacy and as we respect your privacy rights we endeavour to ensure that any personal data you give us via our Website remains private and is used only for the purposes outlined in this Privacy Policy.*

*By using our Website you acknowledge the collection and use of your personal data as outlined below. This version of our Privacy Policy was last updated on 19/03/2021.*

## 1. About our privacy policy

Our website which includes any webpage containing this domain name, including any page that is enabled for use by a mobile device or any webpage redirected from another domain name (the "Website") and the services provided on the Website (for a more complete description of the services see our Terms of Use).

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and your rights in relation to your personal data. Please read the following carefully to understand our views and practices regarding your personal data, how we will treat it and your data protection rights.

## 2. Personal data we collect and process

When you place an order on the shop the following information is collected

- Identity Data such as first name, surname,
- Contact Data such as address, email address, telephone number.

Visit [www.employtec.com](http://www.employtec.com) for more information or to contact us.

- Technical Data such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- Usage Data such as information about how you use the Website
- Marketing and Communications Data such as your preferences in receiving marketing communications from us and third parties and your communication preferences.

## 4. How we collect personal data from and about you

Direct interactions: You may give us your Identity, Contact, Profile, Financial (Customers Only), Marketing and Communications Data by placing an order, filling in online forms or by communicating with us. The personal data we receive from direct interactions with you includes personal data you provide when you:

- apply or subscribe for our Website;
- create a user account on our Website and when you add to and manage your personal profile;
- contact or communicate with us and/or Customers via the Website or other services;
- request marketing communications to be sent to you;

Automated technologies or interactions: As you interact with the Website, we collect Technical Data and Usage Data including details of your device, browsing actions and patterns, searches, products viewed, traffic data, web logs and other communication data and the resources that you access. We collect this personal data by using cookies, tracking codes, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookies policy for further details.

Third parties: We may receive personal data about you from various third parties as set out below:

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Ably, Sendinblue, Stripe
- Contact and Profile Data from providers such as Survey Monkey
- Analytics data from Google Analytics

## 5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. If we do rely on your consent to process your personal data this will be made clear to you at the time, and you have the right to decline to provide us with your consent and to withdraw your consent at any time by contacting us.

We do not request from you and we request you do not provide any special categories/sensitive personal data (e.g. personal data relating to racial or ethnic origin, political or religious opinions, membership of a trade union, physical or mental health or condition or sexual life or orientation). This type of personal data is subject to special protections under EU law.

The processing described in this section is necessary in order for us to perform our contract (e.g. Terms of Use) with you and is necessary for our legitimate interest to provide you with access to the shops on our platform and for you to purchase from them.

We will collect and use Profile, Technical and Usage Data for data analytics purposes to improve the Website, products/services, marketing, user/Customer relationships and experience. This is necessary for our legitimate interest to ensure that Website content is presented in an effective manner for you and for your computer/device.

We will collect and use Identity, Contact, Technical, Usage, Profile Data and Marketing and Communications Data to send you emails from 'WeAreFoodiependent' & Employtec that you request from us or which we feel may interest you, but only where you have consented to be contacted for such purposes. This processing of your personal data is based on your consent and our legitimate interests to direct market, develop our products/services and grow our business

We will collect and use Identity, Contact, Profile, Technical and Usage Data to allow you to participate in interactive features on the Website (WeAreFoodiependent) and

one or more Employtec Services, when you choose to do so. This is necessary for us to perform our contract (e.g. Terms of Use) with you.

We will collect and use Identity, Contact, Profile, Marketing and Communications Data to manage our relationship with you which will include notifying you about changes to our Website, service, terms and/or Privacy Policy. This is necessary for us (i) to perform our contract (e.g. Terms of Use) with you; and (ii) to comply with a legal obligation.

We will collect and use Identity; Contact and Technical Data to administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) which is necessary (i) for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) and (ii) to comply with a legal obligation;

## **6. Marketing**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

You can opt out of any marketing communications from us at any time by using the “Unsubscribe” function at the bottom of the marketing email we send you.

## **7. Disclosure of personal data to others**

Except as set out in this Privacy Policy, we do not disclose to any third party personal data that we collect or you provide to us. We may disclose your personal data to third parties expressly mentioned in this Privacy Policy and the following third parties:

- if you have indicated at registration, or at any time during your time as a user of the Website, that you are happy to receive information or promotions from selected third parties about goods and services which may be of interest to you, we will send you such offers or information. See Marketing above on how to change your preferences;
- any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, where it is necessary to do so for the provision and administration of the services we provide to you;
- We contract with other entities that perform certain tasks on our behalf and who are under our control (“Service Providers”). This is required in order to provide and manage the Website (WeAreFoodiependent) and one or more Employtec Service. Such Service Providers include IT systems suppliers and support, data storage, IT developers, insurance, credit card companies, payment processors, analytics companies, website hosting providers and other service providers;
- professional advisors such as accountants, auditors, lawyers, bankers, insurers, and other outside professional advisors;
- 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;
- entities that regulate or have jurisdiction over us. We will disclose your personal data in order to comply with any legal obligation, if we are ordered to do so by a court of competent jurisdiction, law enforcement, regulatory or administrative authorities or in order to enforce or apply our Terms and Conditions and other agreements, or to protect the rights, property, or safety of Employtec, our Customers, Website users or others. This includes exchanging personal data with third parties for the purposes of fraud protection and credit risk reduction.

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 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. Unless prevented by applicable law, we will notify you when your personal data may be provided to third parties in ways other than explained above, and you may have the option to prevent such sharing at the time that we notify you.

## 8. Customer control of your personal data

If you purchase or communicate with Shops via the Website the relevant Customer will control the personal data you disclose. This will typically relate to your Identity, Contact and Profile Data. Both Employtec and the Customer will jointly control this personal data, and we have arrangements in place intended to ensure your personal data is only used by Customers in accordance with this Privacy Policy. Please exercise your data protection rights relating to this jointly controlled personal data by contacting us at [gdpr@employtec.com](mailto:gdpr@employtec.com)

If a Customer to whom you or we have disclosed any of your personal data downloads or copies the personal data to a medium other than our Website, Employtec will no longer jointly control this personal data. Such data will be subject to the Customer's own data protection and privacy practices. If you wish to understand the Customer's data protection and privacy practices please contact the Customer directly. You will be able to exercise your Data Protection Rights directly with the Customer.

## 9. Data security

Employtec & 'WeAreFoodiependent' is committed to protecting the personal data you provide us. To prevent unauthorized access or disclosure of personal data under our control, Employtec has appropriate security management systems in place to safeguard the personal data we collect. Firewalls, intrusion detection and virus scanners are used on all parts of the Website. Encryption during transmission is also used on sections of the Website where security is particularly important and on all data in transit on the TMS system. We also enforce HTTPS.

While Employtec makes reasonable efforts to protect all personal data, no data transmission over the Internet can be guaranteed to be 100% secure. As a result Employtec cannot ensure or warrant the security of any personal data you transmit to us, you do so at your own risk. You acknowledge that we are not responsible for any intercepted information sent via the Internet, and you hereby waive, release and discharge us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. You must not share your Website password with anyone.

When you disclose personal data, or request us to make your personal data available, to Customers on the Website that personal data will be used by the Customer for its own purposes (e.g. to contact you, arrange an interview, review your suitability for a particular position) and such third party purposes and activities are beyond our control.

## **10. Updating your personal data**

It is important that the personal data we hold is accurate and current. Please keep us informed if any of your personal data changes during your relationship with us. It is your responsibility to keep your personal data up to date at all times.

## **11. Links to third party websites**

Employtec / WeAreFoodiependent product & services advertising clients are given the option to have a profile page on the Website. This includes information related to their company such as: company logo, contact details, company profile, web address and related links. This information is disclosed for your convenience and information, however if you access some of the links and web addresses disclosed on these pages, you will leave our Website.

The Website contains links to and from the websites of our partner networks, Customers, advertisers and affiliates as well as third party websites to which we have no affiliation. 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 websites or their policies.

We also use third party advertisements to support the Website. Some of these advertisers may use technology such as cookies and web beacons when they advertise on the Website, which will also send these advertisers (such as Google through the Google AdSense program) information including your IP address, your ISP, the browser you used to visit the Website, and in some cases, whether you have

Flash installed. This is generally used for geotargeting purposes or showing certain ads based on specific sites visited.

## 12. IP addresses and cookies

We may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration and statistical purposes.

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. On revisiting the Website our computer server will recognize the cookie, giving us information about your last visit. They help us to improve the Website and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customize the Website according to your individual interests and make your usage of the Website more enjoyable;and
- to speed up your searches.

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 the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

For more information about how our cookies work view our cookies policy.

## 13. Data retention

We retain personal data for no longer than is allowed under data protection law and, in any case, no longer than such personal data is necessary for the purpose for which it was processed. 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 unauthorized use or disclosure, the purposes for which



we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

As a registered user of the Website we will retain your Identity, Contact, Profile, Technical, Usage, Marketing and Communications Data for as long as your user account is live. We retain the personal data you provide while your account is in existence or as needed to provide you access to the Website and any Employtec Service you have used. Even if you only use the Website or any other Employtec Service occasionally, we will retain your Identity, Contact, Profile, Technical, Usage, Marketing and Communications Data until you decide to close your user account. In some cases we retain certain Usage Data (e.g. visitor and application statistics in a depersonalized or aggregated form). Also, we retain personal data for longer if required by applicable law or regulation or justified under applicable statutory limitation periods.

## 14. Your legal rights

Under certain circumstances you have rights under applicable data protection law in relation to personal data, namely:

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

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it

impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time if and to the extent we are relying on consent as the legal basis 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.

Regarding your right to have your personal data erased, you can delete your user account with Employtec / WeAreFoodiependent at any time. Once your user account is deleted, it is gone forever and cannot be restored. Some personal data however may still be stored and visible in other places on the Website. For example, if you made an order online with a third party shop, information including your name, email and contact number may still be visible to that business in their user account on the Website. We will endeavour to contact businesses we know who have accessed your personal data within the previous 18 months and inform them of your request to erase your personal data. You can also contact them directly.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We

may also contact you to ask you for further information in relation to your request to speed up our response.

In order to exercise one or more of your rights in respect of your personal data please contact us at [gdpr@employtec.com](mailto:gdpr@employtec.com). We will respond to your request(s) as soon as reasonably practicable, but in any case within the legally required period of time

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at [ico.org.uk](http://ico.org.uk) We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office please contact us in the first instance at [gdpr@employtec.com](mailto:gdpr@employtec.com).

## **15. Changes to our privacy policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page, you may also be notified by email. You should visit this page periodically to review any changes to the Privacy Policy.

## **Contact us**

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us at [gdpr@employtec.com](mailto:gdpr@employtec.com)