



# Customer Privacy Statement

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Phat Retail Ltd is a Food Wholesaler registered in England and Wales 7493376 - registered 14th September 2011 located at Wellesley House, 204 London Road, Waterloooville, PO7 7AN. (Registered Office).

Phat Retail Ltd is registered as a 'Data Controller' with the Information Commissioner's Office (ICO) under the UK General Data Protection Regulation, as we collect and process personal information about you. This privacy policy/statement/notice with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

## This privacy notice will inform you about:

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- what personal information we collect, how we collect it, use it, store it, share it, and dispose of it.
- how we process any personal information including special category data you have voluntarily provided to us relating directly to you or any other third-party individual's information you may have provided via our websites relating to the purchase of Phat Pasty Co. products, or making a general enquiry to the business.

## We collect personal data for the following purposes:

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- deliver our products or services.
- confirm your identity to provide some services.
- contact you by post, email or telephone.
- understand your needs to provide the services/products that you request.
- understand what we can do for you and inform you of other relevant services and benefits.
- obtain your opinion about our services.
- update your customer record.
- help us to build up a picture of how we are performing at delivering services to you and what our other customers need.
- prevent and detect fraud and corruption in our company
- allow us to undertake statutory functions efficiently and effectively.
- make sure we meet our statutory obligations including those related to diversity and equalities.

Providing you with a product or service may be impossible unless we have enough information.

## Your information will be processed for the following purposes:

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- for the service or products you requested, and to monitor and improve our performance in responding to your request.

- to allow us to be able to communicate and provide services and products appropriate to your needs.
- to ensure that we meet our legal obligations.
- where necessary for the law enforcement functions.
- to prevent and detect fraud or crime.
- to process financial transactions including grants, payments and benefits involving the Company.
- where necessary to protect individuals from harm or injury.
- to allow the statistical analysis of data so we can plan the provision of services.

We will not pass any personal data on to third parties, other than those who either process information on our behalf, or because of a legal requirement, and will only do so, after we have ensured that adequate organisational and technical measures are in place to protect the data.

We will not disclose any information that you provide to us, to anyone else without your permission, except in situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put a person at risk.

We will only keep personal data in identifiable form as long as is necessary for the purposes for which it is collected, or where we have a legal obligation to do so. Once we no longer need personal data it shall be deleted or rendered permanently anonymous.

We may process your information overseas using web services that are hosted outside the European Economic Area, but only with data processing agreements that meet our obligations under the UK General Data Protection Regulation.

## **Legal basis for processing your personal information**

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There are a number of legal reasons why we need to collect and use your personal information.

Generally, we collect and use personal information where:

- you, or your legal representative, have given consent.
- you have entered into a contract with us.
- it is necessary to perform our statutory duties.
- it is necessary to protect someone in an emergency.
- it is required by law.
- it is necessary for employment purposes.

- it is necessary to deliver health or social care services.
- you have made your information publicly available.
- it is necessary for legal cases.
- it is to the benefit of society as a whole.
- it is necessary to protect public health.
- it is necessary for archiving, research, or statistical purposes.

If we process your information entirely from your 'Consent' (i.e. non-statutory service), you have the right to withdraw it any time. If you want to withdraw your consent, please contact [HR@phatpasty.com](mailto:HR@phatpasty.com) and tell us which service or products you are using so we can deal with your request.

## Information sharing

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We may, occasionally, need to share your information with third parties that provide services. These providers are obliged to keep your details securely and use them only to fulfil a justified need.

We may disclose information to other partners where it is necessary, either to comply with a legal obligation, or where permitted under the UK **General Data Protection Regulation** e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime or fraud.

Where we need to disclose **Special Category** or confidential information such as medical details to other partners, we will do so only with your prior explicit consent or where we are legally required to.

We may disclose information when necessary to prevent risk of harm to an individual.

We have Information Sharing Agreements in place with other partners and external organisations to help deliver the best services for you. We do this to comply with UK Data Protection law and so you can be confident that they all comply with the same privacy principles as the local authority.

At no time will your information be passed to external organisations for marketing or sales purposes or for any commercial use without your express consent.

## Detection and prevention of crime and fraud

We may use any of the information you provide to us for the prevention and detection of crime and fraud. We may also share this information with other bodies that are responsible for auditing and investigating our financial work and book.

## **Telephone calls**

Ordinarily we will inform you if we record or monitor any telephone calls you make to us. This will be used to increase your security, for our record keeping of the transaction and for our staff training purposes.

## **Emails**

If you email us we may keep a record of your email address, as well as your email for our records. For security reasons, we will not include any confidential information about you in any email we send to you. We would also suggest that you keep the amount of confidential information you send to us via email to a minimum and use our secure online services or by post.

## **Website**

If you are a user with general public access, our website does not store or capture personal information but merely logs a number called your IP address which is automatically recognised by the system.

The system will record personal information if you:

- subscribe to or apply for services that require personal information.
- order our products.
- report a fault and give your contact details for us to respond.
- contact us and leave your details for us to respond.

We employ cookie technology to help log visitors to our website.

## **Children's data**

Phat Retail Ltd is committed to protecting the privacy of children. Our services are not intended for children under the age of 16, and we do not knowingly collect personal data from them. If we discover that a child under 16 has provided us with personal information, we will take steps to delete such information from our systems. Parents or guardians who believe that their child has provided us with personal information should contact us immediately.

## **Cookies**

We sometimes place small data files on your computer. These are known as cookies and most websites do this. A cookie is a string of information that is sent by a web site and stored on your hard drive or temporarily in your computer's memory. The information collected is used for the administration of the server and to improve the service provided by the web site. Cookies provide an audit trail of your browsing history, you can reject the use of cookies but you may be asked for information again, e.g. to participate in a survey.

They improve browsing by:

- remembering who you are after you login to the site.

- prefill some of the online forms with information you already gave to us so you don't need to keep entering it.
- measuring how you use the website to make your browsing experience more efficient and user friendly.

Apart from the ones related to the login process our cookies aren't used to identify you personally. They exist to make the site work better for you. You can manage and/or delete these small files as you wish.

Further information and how to block cookies is located on our website cookie policy: [Cookie-Policy-21.05.18.pdf \(phatpasty.com\)](#)

To learn more about cookies and how to manage them visit [AboutCookies.org](#).

## How we protect your information

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The information you provide will be protected by adequate organisational and technical measures, to ensure it can't be seen by, accessed or disclosed to anyone who shouldn't.

We will not keep your information longer than it is needed or where the law states how long this should be kept. We will dispose of paper records or delete any electronic personal information in a secure way.

Phat Retail ensures that international data transfers comply with GDPR and UK Data Protection Act 2018. When transferring personal data outside the European Economic Area, we implement standard contractual clauses and other legal mechanisms to safeguard the data. We conduct regular assessments to ensure that these international partners provide an adequate level of data protection, consistent with UK and EU standards.

In the event of a data breach, Phat Retail is committed to complying with the GDPR and UK Data Protection Act 2018 breach notification requirements. Should any breach occur that is likely to result in a risk to the rights and freedoms of individuals, we will notify the relevant supervisory authority within 72 hours of becoming aware of the breach. Affected individuals will also be informed without undue delay if the breach poses a high risk to their rights and freedoms.

## Your rights

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The UK General Data Protection Regulation requires Phat Retail to ensure that any information we hold about you is correct. There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected.

You have the right to request that Phat Retail stop processing your personal data in relation to any of our services, however, this may affect service delivery to you. This right applies primarily to 'Consent' based services and not 'Statutory' service offerings.

Where possible we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

You also have the right to:

- correct the data we hold about you.
- get a copy of the data we hold, as well as the right to be forgotten (have your personal data deleted from our archives).
- Have your personal information transferred to another information controller in a commonly used format (data portability).
- question decisions made about you by a computer, unless it's required for any contract you have entered into, required by law, or you have consented to it
- object if you are being profiled.

## Procedures for securing compliance

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### Accountability principle

The controller Phat Retail shall be responsible for, and be able to demonstrate compliance with the rules and principles this policy sets. Our Data Protection Officer is responsible for monitoring Phat Retail compliance with this policy.

### We will:

- ensure that records are kept of all personal data processing activities and that these are provided to the Information Commissioner on request.
- carry out a Data Protection Impact Assessment for any high-risk personal data processing, and consult the Information Commissioner if appropriate.
- ensure that a Data Protection Officer is appointed to provide independent advice and monitoring of the department's personal data handling and that this person has access to report to the highest management level of the department.
- have in place internal processes to ensure that personal data is only collected, used or handled in a way that is compliant with data protection law.

Data controller's policies as regards retention and erasure of personal data.

We will ensure, where special category or criminal convictions personal data is processed, that:

- there is a record of that processing, and that record will set out, where possible, the envisaged time limits for erasure of the different categories of data.

- where we no longer require special category or criminal convictions personal data for the purpose for which it was collected, we will delete it or render it permanently anonymous.
- data subjects receive full privacy information about how their data will be handled, and this will include the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.

This policy will be retained for the duration of our processing and for a minimum of 6 months after processing ceases.

## Additional special category processing

We process special category personal data in other instances where it is not a requirement to keep an appropriate policy document. Our processing of such data respects the rights and interests of the data subjects. We provide clear and transparent information about why we process personal data including our lawful basis for processing in our privacy notice.

If you have any questions or concerns don't hesitate to contact our Compliance Officer at [HR@phatpasty.com](mailto:HR@phatpasty.com)

**Document Title:**

Phat Customer Privacy Notice

**Approved:**

18<sup>th</sup> March 2024

**Review Date:**

18<sup>th</sup> March 2026



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