

# Website Privacy Policy

This website (www.davidstowcheddar.co.uk) (the “**Website**”) is operated by Dairy Crest Limited (trading as Saputo Dairy UK) (“**Dairy Crest**”, “**we**”, “**us**” or “**our**”).

## 1. Important information and who we are

Dairy Crest is the controller of your personal data. This is a legal term – it means that we make decisions about how and why we use your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

Dairy Crest is a part of the Dairy Crest group of companies.

## 2. What is this document?

We respect your privacy and are committed to protecting your personal data. This privacy policy (the “**Policy**”) will inform users of our Website and individuals that purchase or consume products that are sold by or on behalf of us (referred to as (“**you**” or “**your**”) how we look after your personal data.

Once you choose to provide us with any information by which you can be identified, then you can be assured that it will only be used in accordance with this Policy.

If you have any questions about this Policy please contact the Data Privacy Manager using the details set out in paragraph 10 below.

Our websites and social media pages may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites. When you leave our websites or social media pages, we encourage you to read the privacy notice of every website you visit.

## 3. What types of personal data do we collect and where do we get it from?

“Personal data” is any information that relates to an identifiable natural person. Your name, address, and contact details are all examples of your personal data, if they identify you.

The term “process” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

We collect many different types of personal data about you for lots of reasons including:

### Types of personal data

#### Identity Data

Includes first name, last name, marital status, title, date of birth and gender, location and job title (each if relevant).

### Collected from

You

From third parties such as a store you bought one of our products from, if you ask for details of your complaint, query or feedback to be passed to us for investigation or resolution.

#### Contact Data

Includes billing address, shipping address, email You

address and telephone numbers and social media contact details (if relevant).

#### **Financial Data**

Includes bank account details and/or payment card details. You  
Third party payment providers

#### **Account Data**

Account records, log-in details, passwords, account settings, the count of your total orders and total amount spent, your account creation date and the date of your most recent order. You

#### **Transaction Data**

Includes details of products you have purchased which are manufactured by us or which you have purchased directly or indirectly from us, payments made/refused, total and invoice details. Your device  
Third party payment providers

#### **Profile Data**

Includes your interests, preferences (including marketing preferences), behaviours, hobbies, activities, household or lifestyle information, feedback, opinions and survey responses. You

#### **Technical Data**

Includes 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 websites. Your device  
Analytics providers  
Automatic collection using cookies, server logs and other similar technologies (please see our cookies policy for further details  
<https://davidstowcheddar.co.uk/cookies-policy/>).

#### **Usage Data**

Includes information about how you use our websites and social media pages. Your device

#### **Correspondence Data**

Includes records of your correspondence with us (including emails, mail correspondence, web contact forms/details and social media correspondence), incident number and call recordings. You

#### **Contest Data**

Includes information provided when entering into You

a contest with us, such as your name, address email address and contest entry, and for contest winners, identification documents.

If any of the personal data you have given to us changes, such as your contact details, please inform us without delay by contacting the Data Privacy Manager using the details set out in paragraph 10 below.

**4. What do we do with your personal data, and why?**

We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are **six** such permitted lawful basis for processing personal data.

Details of our lawful bases for processing alongside the purposes for which we process your personal data and the categories of data we process for each such purpose are set out below.

Purpose/Activity	Categories of personal data	Lawful basis
To enable us to investigate and deal with your complaint, question, feedback or compliment	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Correspondence Data</li> <li>• Financial Data</li> <li>• Account Data</li> <li>• Transaction Data</li> <li>• Profile Data</li> <li>• Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary to comply with a legal obligation</li> <li>(b) Necessary for our legitimate interests (for quality monitoring and improvements, to carry out an investigation, to take appropriate action and to provide a meaningful response)</li> <li>(c) Necessary for the performance of a contract</li> <li>(d) Necessary for the establishment, exercise or defence of legal claims</li> <li>(e) Necessary for reasons of substantial public interest</li> </ul>
To provide feedback to the business on the performance of our products and staff and investigate any product issues.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Correspondence Data</li> <li>• Financial Data</li> <li>• Account Data</li> <li>• Transaction Data</li> <li>• Special Category Data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for quality monitoring and product improvements, new product development and investigations and for customer service monitoring)</li> <li>(b) Necessary for the establishment, exercise or defence of legal claims</li> <li>(c) Necessary for reasons of substantial public interest</li> </ul>
To check for fraud or malicious or unfounded	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (prevention of</li> </ul>

Purpose/Activity	Categories of personal data	Lawful basis
claims	<ul style="list-style-type: none"> <li>• Financial Data</li> <li>• Account Data</li> <li>• Profile Data</li> <li>• Transaction Data</li> <li>• Correspondence Data</li> </ul>	fraudulent claims) (b) Necessary for the establishment, exercise or defence of legal claims
To manage our relationship with you which may include: (a) Providing you with updates and a response to your question or complaint. (b) Notifying you about changes to our privacy policy (c) Asking you to leave a review or take a survey	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> <li>• Correspondence Data</li> <li>• Profile Data</li> </ul>	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (keeping you informed as to the progress of your question or complaint, to keep our records updated and to study how consumers use our products)
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Account Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	(a) Necessary 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 reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website	<ul style="list-style-type: none"> <li>• Account Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	Necessary for our legitimate interests (to keep our website updated and relevant)
To comply with our legal requirements	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Correspondence Data</li> <li>• Financial Data</li> <li>• Account Data</li> <li>• Transaction Data</li> <li>• Profile Data</li> <li>• Special Category Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	(a) Necessary to comply with a legal obligation (b) Necessary for reasons of substantial public interest
To deliver to you by email or	<ul style="list-style-type: none"> <li>• Identity Data</li> </ul>	(a) Consent

Purpose/Activity	Categories of personal data	Lawful basis
by post press releases and publications and to notify you of products or special offers that may be of interest to you	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Correspondence Data</li> </ul>	(b) Necessary for our legitimate interests (to promote our business)
Publishing external facing materials for marketing and public relations purposes such as where we mention individuals in our marketing materials, social media posts and press releases	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Correspondence Data</li> <li>• Transaction Data</li> <li>• Profile Data</li> </ul>	(a) Consent (b) Necessary for our legitimate interests (to promote our business)
To enforce the Website's terms of use and to prevent potentially prohibited or illegal activities for security purposes	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Account Data</li> <li>• Transaction Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	(a) Necessary for our legitimate interests (prevention/secession of misuse of the Website and to maintain the security of the Website) (b) Necessary for the establishment, exercise or defence of legal claims
To process payments from customers	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> </ul>	Necessary for the performance of a contract
To send brand news updates and marketing prompts to you	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Correspondence Data</li> <li>• Account Data</li> </ul>	(a) Consent (b) Necessary for our legitimate interests (to promote our business)
To ship orders to you	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> </ul>	(a) Necessary for the performance of a contract (b) Necessary for our legitimate interests (to deal you're your queries or concerns relating to orders)
To run contests	<ul style="list-style-type: none"> <li>• Contest Data</li> </ul>	Necessary for our legitimate interests (to increase consumer engagement)

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please note that where we have indicated in the above table that our processing of your personal data is either:

- necessary for us to comply with a legal obligation; or
- necessary for us to take steps, at your request, to potentially enter into our contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to process your order with us.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

## **5. Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

### *Inside the Dairy Crest group*

We will need to share your personal data with other companies in the Dairy Crest group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data and to provide legal and audit services.

Where any Dairy Crest group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

Access rights between members of the Dairy Crest Group are limited and granted only on a need to know basis, depending on job functions and roles.

### *Outside the Dairy Crest group*

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third party service providers include service providers and/or sub-contractors, such as our outsourced IT systems software and maintenance, back up, and server hosting providers, our courier partner and service providers who provide social media and marketing services (including direct marketing by email).

We may also disclose your information to our appointed third party agents and suppliers in order to process your order. These third parties will only have access to your information in

order for them to perform specific tasks related to your order and they may not use it for any other purposes.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

- if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
- if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- payment providers;
- social media providers;
- e-mail marketing providers;
- consultants and professional advisors including auditors, legal advisors and accountants;
- advisors and fraud prevention agencies to provide fraud detection services;
- courts, court-appointed persons/entities, receivers and liquidators;
- business partners and joint ventures;
- trade associations and professional bodies;
- insurers; and
- governmental departments, statutory and regulatory bodies including the Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

We may also share your personal data with third parties, as directed by you.

## **6. Where in the world is your personal data transferred to?**

Some of our third-party suppliers transfer or process your personal data outside the United Kingdom. If any of our processing activities, or those of our third party suppliers or sub-contractors, require your personal data to be transferred outside the United Kingdom, we will only make that transfer if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;

- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient (please contact the Data Privacy Manager using the details set out in paragraph 10 below if you wish to obtain a copy of these);
- the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- you explicitly consent to the transfer.

## 7. How long do we keep your personal data for?

We will keep your information whilst you are customer of Dairy Crest and for a limited period after you close your account or the last time you make an order with us, or longer if necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others but we will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

## 8. What are your rights in relation to your personal data and how can you exercise them?

You have certain legal rights, which are briefly summarised below, in relation to any personal data about you which we hold.

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of our staff.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your



		consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal data accurate and up to date.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

If you wish to exercise any of your rights please contact Data Privacy Manager using the details set out in paragraph 10 below in the first instance.

You also have the right to lodge a complaint with the Information Commissioner’s Office, which is the UK data protection regulator. More information can be found on the Information Commissioner’s Office website at <https://ico.org.uk/>.

## 9. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

This version was last updated on 9 December 2020.

## 10. Where can you find out more?

We have appointed a Data Privacy Manager to oversee compliance with this Policy. The Data Privacy Manager should be your first point of contact if you have any queries or concerns about your personal data.

Contact:

Email address:

Postal address:

Data Privacy Manager

[datacontroller@saputo.com](mailto:datacontroller@saputo.com)

Data Privacy Manager

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