Privacy Policy

We are committed to ensuring the security of your personal data and protecting your privacy. This policy will inform you about how we look after your personal data when you use our service. It will also tell you about your privacy rights and how the law protects you.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

# Who are we?

We are The Oxford Food Company Ltd. We are a company incorporated and registered in England and Wales. Our company number is 3891323. Our registered office address is 61a Woodstock Road, Oxford, OX26HJ. We trade from East West Provisions at the same address.

When we refer to "**we**", "**us**" or "**our**" in this policy, we are referring to Oxford Food Company Ltd. We are the 'controller' in relation to the personal data you provide to us, which means we determine the purposes and the way in which your personal data is, or will be, processed and are responsible for it.

# How to contact us

Questions, comments and requests regarding this policy are welcomed. You may write to us at:

Email: [info@eastwestprovisions.co.uk](mailto:info@eastwestprovisions.co.uk)

Post: 61a Woodstock Road, Oxford, OX26HJ

# About our service

We have been supplying food and necessities to the local community for the past 20 years and we value your regular custom. The Covid 19 pandemic and the associated movement restrictions have resulted in many people struggling to access provisions in a safe and convenient way. We want to repay your valued custom by providing a much-needed delivery service including:

* Accepting orders by both telephone and email
* Low minimum order value
* Limited delivery charges, and only when necessary
* Someone looking out for you (albeit from a safe distance)

Please see our website for details of how we are offering a safe and convenient service, to reduce the risk of infection to our customers and to our staff.

In order to efficiently provide this service, we are going to have to collect some personal data from you. This will allow us to deliver to your home and communicate with you about orders.

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data so that you can be confident when you use our service that you know what your personal data is being used for and that it is being kept safe.

# Definitions

**Personal data** - Personal data is information that relates to an identified or identifiable individual, including a name, a number or other identifiers such as address.

**Anonymised data** - this is data from which information that enables the concerned individual to be identified has been removed.

# How is your personal data collected?

We use different methods to collect data from and about you including through:

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| --- | --- |
| **Direct interactions** | You may give us your personal data by communicating with us in person, by email, by phone, by post, by submitting an enquiry via our website, or otherwise. |
| **Third parties** | We may receive personal data about you from various third parties such as one of your relatives. |

# What happens if you don't provide us with personal data we have requested?

Where we need to collect personal data to provide our service, and you don’t provide that data when requested, we may not be able to provide you with our service. We will notify you if this is the case at the time.

# What information do we collect about you?

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| --- |
| **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 and process the following different kinds of personal data about you:

|  |  |
| --- | --- |
| **Identity and Contact data:** | includes full name, email address, home and mobile telephone numbers |
| **Correspondence data:** | includes information submitted by you to us via our website, email or post |
| **Feedback data:** | includes any feedback you provide to us about your use of our service |

If you want any further information about how we collect or use your personal data, please contact us at [info@eastwestprovisions.co.uk](mailto:info@eastwestprovisions.co.uk)

# How do 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 we need to perform the **contract** we have entered into with you or to take steps at your request prior to entering into a contract (e.g. when you request a delivery). * Where we need to comply with a **legal or regulatory obligation.** * 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. |

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please 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 contact us on [info@eastwestprovisions.co.uk](mailto:info@eastwestprovisions.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

**While we securely store personal data to enable us to provide our service, we currently do NOT store any payment details.**

|  |  |  |
| --- | --- | --- |
| **Purpose/activity** | **Type of data** | **Lawful basis for processing** |
| To respond to an enquiry made via our website | Identity, contact data | Necessary in order to enter into a contract with you |
| To provide our service:   * To record and process your order * To deliver to your address * To communicate with you about your order * To deal with any problems with your order | Identity data, contact data | Necessary in order to perform our contract with you |
| To manage our relationship with you. This includes responding to any questions you may ask us; and notifying you of changes to our service | Identity data, contact data | Necessary in order to perform our contract with you  Necessary for our legitimate interests – to run our business |
| To review and monitor our service | Identity data, contact data | To comply with our legal obligations  Necessary for our legitimate interests – to run our business |
| To contact you to ask you to provide feedback, complete surveys or for other market research purposes and to use such information to improve our service | Contact and feedback data | Necessary for our legitimate interest – to analyse and improve our service  Consent |

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on [info@eastwestprovisions.co.uk](mailto:info@eastwestprovisions.co.uk)

**We will not use your data for marketing purposes.**

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

# Disclosure of your information

For the purposes set out above, we may share your personal information with the following third parties, where it is necessary to provide our service or communicate with you:

|  |  |
| --- | --- |
| **Third party** | **Detail** |
| **Service providers:** | including those who provide:   * Webhosting, IT and system administration services * Email and other communications services * Metrics and analytics |
| **Corporate partners:** | includes third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. 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 notice. |

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.

# International transfers

Your data will be handled and stored within the European Union/European Economic Area (EU/EEA). On occasions, data may be transferred outside of the EU/EEA, for example, if we use a communications service that has host servers located in another country. If your data is transferred in this way, it is done so under contract, ensuring it is afforded the same degree of protection as under EU law, that is:

(i) the EU Commission’s decision regarding adequate levels of protection;

(ii) application of the EU Commission’s standard contract clauses for transfers to third parties;

(iii) that the recipient is covered by the Privacy Shield rules and thus the requirement of an adequate level of protection (applies to transfers to the United States); or

(iv) other applicable safeguards in order to fulfil applicable data protection legislation.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

# Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

# How long will we store your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or accounting 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.

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| --- | --- |
| **Data type** | **How long will you keep my data?** |
| Identity data, contact data | We will cease processing your data when you ask us to, or when you have not placed an order for 5 years |

Where we anonymise your personal data (i.e. so that it can no longer be associated with you) for the purposes of monitoring our business, then we may use this information indefinitely without further notice to you.

# Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please read through the table below to find out more about these rights.

|  |  |
| --- | --- |
| **Your right** | **What this means** |
| Access to your information | You have the right to ask for a copy of the information which we hold on you (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. |
| Correcting personal data | You have the right to request that we correct personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected, though we may need to verify the accuracy of the new data that you provide to us.  It is important that the personal data we hold about you is accurate and current, so please keep us informed if your personal data changes during your relationship with us. |
| Deleting personal data | You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. This is more commonly known as the 'right to be forgotten'. 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.  Please note, however, that we may not always be able to comply with your request to delete or remove personal data for specific legal reasons which will be notified to you, if applicable, at the time of your request. |
| Objecting to processing | You may object to us processing 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. |
| Restriction of processing | This enables you to ask us to suspend the processing of your personal data in the following scenarios:   * if you want us to establish the data's accuracy; * where our use of the data is unlawful but you do not want us to erase it; * 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 * you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. |
| Transferring your personal data | In certain circumstances, you may 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.  Please 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. |
| Withdrawing consent | Where we are relying on consent to process your personal data you can withdraw your consent at any time. Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. |
| Review by an independent authority | You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office. If you do have a complaint, we would appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance if possible. |

If you wish to exercise any of the rights set out above, please contact us. 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# Changes to our privacy policy

Version 1.0

This version was created on 21.04.20 by Simon Jones