



Dear Customers,

Currently, the Data Protection (Jersey) Law 2005, is the key piece of legislation governing data protection. On 25th May 2018 this changes, the EU General Data Protection Regulation (GDPR) is the new piece of legislation which has created new legislation in Jersey;

- i. Data Protection (Jersey) Law 2018
- ii. Data Protection Authority (Jersey) Law 2018

This new legislation requires data processing contracts to contain additional provisions regulating the processing of personal data. As a result, we will amending our current Privacy Policy within our terms and conditions.

Additionally, due to the implementation of this new legislation, we are required to adhere to new rules relating to the use of personal data, what we store, how we store it and who we may share it with.

In order to make compliance with this new legislation as simple and straightforward as possible, we will add this Privacy Policy to our current terms and conditions.

It is important to note that;

- ✓ Our terms and conditions and any other agreements already in place between us shall continue in full force and effect;
- ✓ In the event of any conflict or inconsistency between this letter and the terms and conditions already in place, this letter shall prevail.

If you do not notify us of your disagreement with any of the terms of this letter, you will be deemed to have accepted it.

Yours Sincerely

Valley Foods Ltd

Data Protection Policy 2018

Valley Foods Ltd is committed to ensuring that your privacy is protected and that your data is stored and processed in a secure manner.

What we collect

We collect the following information from you with your consent;

- Full Name
- Address
- Phone Numbers
- Email Address
- Card details (encrypted once entered)
- Customer Password

On top of this we will also store your Customer Code and your Trading History with us, including Statements/Invoices and Payment History.

No special category data will be collected or stored such as racial or ethnic origin, political, philosophical, or religious beliefs, trade union membership or genetic, biometric and health data.

We may also use technology to track the patterns of behaviour of visitors to our site. This can include using a 'cookie' which would be stored on your browser. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic, they allow web applications to respond to you as an individual. We use cookies to identify which pages are being used, this helps us analyse data and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes. A cookie in no way gives us access to your computer, you can choose to accept or decline cookies, you can also go into your browsers settings and remove this cookie at any time.

What we do with your information

The information we collect is necessary for us to carry out our contract with you, to enable us to deliver our goods and services as efficiently as possible. We do not ask for, or hold any personal data or information that is not appropriate or relevant. Other ways we may use your information;

- Internal record keeping
- Correspondence to further identify your product and service requirements
- We may use information to improve our products and services
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided, you have the choice to uncheck the box at registration to not receive these emails, or can contact us at any time to take your email off our mailing list at admin@valley.lls.com

How we store information

Information and records relating to our customers are stored securely, using a mixture of encryption, password protection, and servers/back ups all kept with multiple lock protection.

Information will only be stored as long as needed or required by law and will be disposed of appropriately.

Who has access

All customers have the right to have access to the information held on them, we will also take reasonable steps to ensure that the information we keep is up to date by contacting customers about whether there have been any changes.

Valley Foods Ltd is the “Data Controller” under the new legislation, and in some instances we outsource to “Data Processors.” Data Processors only act in accordance with our, the Data Controller’s, instructions, and comply with our Privacy Policy. As a Data Controller we are also registered with the Information Commissioner of Jersey.

All staff working at Valley Foods Ltd comply with the new legislation to ensure the security and confidentiality of all personal data being collected and processed, this applies to whether personal data is taken electronically, or in a paper based format. Staff breaches of data protection legislation may result in disciplinary action. Any staff holding electronic devices comply to having password protection and keeping this device safe and secure at all times.

Data Retention and the Right to be Forgotten

The new legislation introduces a right for individuals to have personal data erased, individuals can make a request for erasure verbally or in writing and we have one month to respond to this request. The right is not absolute and our legal obligations comes above the right to be erased.

We keep personal data for as long as the account remains active, once an account becomes inactive, we endeavour to contact each individual after 24 months of inactivity to consent to the termination of their account and deletion of their personal data.

Data Breaches

The new legislation introduces a duty on all organisations to report certain types of personal data breaches to the relevant authority, in our case this would be to the Information Commissioner of Jersey. We are required to inform the Information Commissioner within 72 hours of becoming aware of the breach, where feasible. Also, if a breach is likely to result in a high risk of affecting our customers, we would inform those customers without undue delay.