

Privacy notice for customers and prospective customers

1. The Purpose of this privacy notice

- 1.1. Norfolk Feather Company Limited is committed to protecting the privacy and security of the personal data that it holds.
- 1.2. This privacy notice describes how we collect and may use personal data prior to, during and after your relationship with us in accordance with the General Data Protection Regulation (GDPR).
- 1.3. We are required under data protection legislation to notify you of the information contained in this privacy notice.
- 1.4. It is important that you read this notice, together with any other privacy notice we may issue on specific occasions, so that you are aware of how we are or may use and why we are or may use your data.
- 1.5. Norfolk Feather Company Limited may update this notice at any time.

2. Data controller

- 2.1. Norfolk Feather Company Limited is a “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. Any of its directors can be contacted in relation to this privacy notice.

3. Data privacy manager

- 3.1. We have appointed a Data Privacy Manager to oversee compliance with this privacy notice.
- 3.2. The privacy manager is Joanna Landy.
- 3.3. If you have any questions about this privacy notice or how we handle your personal data, please contact the Data Privacy Manager:

The Feather Mills
Park Road
Diss
Norfolk
IP22 4AS

Email: JoLandy@norfolkfeathercompany.co.uk

4. Data protection principles

- 4.1. Data protection law says that the personal data we hold about you must be:
 - 4.1.1. used lawfully, fairly and in a transparent way.

- 4.1.2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 4.1.3. relevant to the purposes we have told you about and limited only to those purposes.
- 4.1.4. accurate and kept up to date.
- 4.1.5. kept only as long as necessary for the purposes we have told you about.
- 4.1.6. kept securely.

5. What data we hold about you

5.1. 'Personal data' is any information about an individual from which that person can be identified. It does not include data where the identity has been removed, known as anonymous data. For the purposes of this Data Privacy Notice you are either an individual or you are employed by our commercial customer or you are, for example, an individual sole trader. Personal data also includes information that you provide to us about other individuals within your employer's organisation.

5.2. Where relevant and appropriate we may collect, store and use the following categories of personal data about you:

- 5.2.1. Personal contact information including your name, title, postal addresses, telephone numbers (including mobile numbers) and email addresses.
- 5.2.2. Business contact information including your job title, postal addresses, telephone numbers (including mobile numbers) and email addresses.
- 5.2.3. Personal bank account details, for example, if you are a sole trader.

5.3. Where we are a "data processor" only, meaning we process personal information on behalf of you or your employer as the data controller, we will only process data in accordance with your instructions.

6. Special categories of data

6.1. "Special categories" of information are more sensitive personal information and is information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation and criminal convictions and offences.

6.2. We do not anticipate collecting any special categories of information. If the position changes we will inform you.

7. How we use data about you

7.1. We will only use your personal data when permitted to do so.

7.2. Most commonly, we will use your personal data in the following circumstances:

7.2.1. Where we need to perform the contract we have entered into with your employer or you where, for example, you are a sole trader.

7.2.2. Where we need to comply with a legal obligation.

7.2.3. 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.

7.2.4. We may also use your personal data in the following situations, which are likely to be rare:

7.2.4.1. Where we need to protect your interests (or someone else's interests).

7.2.4.2. Where it is needed in the public interest or for official purposes.

7.3. We may only process special categories of personal data in the following circumstances:

7.3.1. with explicit consent.

7.3.2. the processing is needed to protect your interests (or someone else's interests, for example, your employer) and you are not capable of giving your consent.

7.3.3. the processing relates to personal data which you have made public .

7.3.4. the processing is necessary for establishing, exercising, or defending legal claims.

7.4. We need all the categories of data referred to in this privacy notice to allow us to:

7.4.1. discuss your employer's requirements with you and provide details about the services we can provide to your employer (or to you where, for example, you are a sole trader).

7.4.2. carry out services for your employer and perform the contract that we enter into with your employer (or you where, for example, you are a sole trader).

7.4.3. to pursue legitimate interests of our own or those of third parties (including your employer), provided your interests and fundamental rights do not override those interests.

7.5. Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

7.6. If you do not provide data when requested, we may not be able to contact you, perform the contract we have entered into with your employer or you if, for example, you are a sole trader, and we may be prevented from complying with our legal obligations.

7.7. 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.

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

7.9. 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.

7.10. The situations in which we will process your personal data are listed below.

7.10.1. Administering the contract we have entered into with your employer or you if, for example, you are a sole trader, including performance of the contract and invoicing.

7.11. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive information in exceptional circumstances. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. It is not a condition of any contract with us that you agree to any request for consent from us and you have the right to refuse to give your consent.

7.12. Additional safeguards will be put in place when processing special categories of data, including but not limited to the use of encryption.

8. Automated decision-making

8.1. Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means. We will notify you if this position changes.

9. Data sharing

9.1. We may have to share your data with third parties.

9.2. Third-parties include:

9.2.1. Couriers – Hermes or another.

9.2.2. Accountant.

9.3. Where we are able to do so, we will require third parties to:

9.3.1. respect the security of your data and have appropriate security measures in place.

9.3.2. treat it in accordance with the law.

9.3.3. use your personal data for specified purposes.

9.3.4. use your personal data in accordance with our instructions.

9.4. We may also need to share your personal data with a regulator or to otherwise comply with the law.

9.5. We do not anticipate transferring your data outside the EU.

10.Data security

10.1. We have 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 who have a business need to know and they will only process your personal data on our instructions and they are subject to a duty of confidentiality.

10.2. Details of the measures may in place may be obtained on request from the Data Privacy Manager.

10.3. In the event of a suspected data security breach we will notify the Information Commissioner's Office ('ICO'), the applicable regulator and you where we are required to do so.

11.Data retention

11.1. We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal and regulatory requirements. The retention period for personal data is determined by a number of factors, including:

11.1.1. the amount, nature and sensitivity of the personal data.

11.1.2. the potential risk of harm from unauthorised use or disclosure of the personal data.

11.1.3. the purposes for which we process your personal data.

11.1.4. whether we can achieve purposes through other means.

11.1.5. any legal and regulatory requirements.

11.2. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

- 11.3. Once your employer or you if, for example, you are a sole trader cease to be a client of ours (or you cease to be employed) we will retain and securely destroy your personal data in accordance with best practice, applicable laws and regulations.

12. Rights of access, correction, erasure, and restriction

- 12.1. Under certain circumstances you have the right to:
- 12.1.1. **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.
 - 12.1.2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - 12.1.3. **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 exercised your right to object to processing (see below).
 - 12.1.4. **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. You also have the right to object where we are processing your personal data for direct marketing purposes.
 - 12.1.5. **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
 - 12.1.6. **Request the transfer** of your personal data to another party.
 - 12.1.7. **Withdraw consent** at any time where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. To withdraw your consent, please contact the Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
 - 12.1.8. **Complain to the ICO:** the ICO is the UK supervisory authority for data protection issues.

- 12.2. If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data or request that we transfer a copy of your personal data to another party, please contact the Data Privacy Manager in writing.
- 12.3. 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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 12.4. We may need to request specific information from you to help us confirm your identity and verify your right to access the data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

13.Changes to this privacy notice

- 13.1. We reserve the right to update this privacy notice at any time. The current version of this privacy notice will be available on our website.
- 13.2. We will provide you with a new privacy notice when we make any substantial updates.
- 13.3. If you have any questions about this privacy notice, please contact the Data Privacy Manager.