

PRIVACY POLICY

Objective:

This privacy notice aims to give you information on how SALSA collects and processes your personal data, including any data you may provide:

- a) Through our website if you register for access to our online member services:
 - for SALSA members to manage their membership details;
 - for industry to check the status of SALSA members and monitor their supply chain.
- b) If you subscribe to our newsletter or enroll on a training course/webinar.
- c) If you are a member of a SALSA committee or an industry stakeholder contact.

Scope:

SALSA respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. Please read this statement to understand how we protect your personal information. This statement does not and is not intended to create any contractual or other legal rights.

Our website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Policy:

1. GENERAL

We will only use your personal information to improve the service that we provide to you and to our stakeholders. This Privacy Policy fully complies with the UK General Data Protection Regulation (UK GDPR) tailored by the Data Protection Act 2018 and we will, within reason, ensure that your information is secure and monitored with regard to access, both internally and externally. The personal information you submit through our website www.salsafood.co.uk or by any other means will be collected and safeguarded by Salsa Technologies Ltd. located at Bloxham Mill, Barford Road, Bloxham, Banbury, OX15 4FF.

Personal Data

The personal data that you submit to SALSA via this website or any other means may be kept on our database and will not be released to a third party. At some point, you will be given the option to receive information from SALSA about other products and services via email. If you opt not to receive such communications, you will only receive the information that is directly relevant to you, which you have provided consent to receive. Through a secure user identity and password, you will be given access to your personal data and will have the opportunity to update, change or remove this information.

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Third Party Links

SALSA website provides links to third party websites, plug ins and applications over which we have no control and we have no responsibility for their Privacy Policies. 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 and are not responsible for their privacy statements. If you follow such a link from this website to another site, this Policy will no longer apply.

2. THE DATA WE COLLECT ABOUT YOU

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). SALSA never sells or otherwise passes on your personal information to third parties. We only ask for and collect personal information necessary to fulfil the service we provide through SALSA. Personal details about you, found in the SALSA Directory, are published only with your permission. You can withdraw your consent at any time by contacting info@salsafood.co.uk.

Any information collected as part of the planning or delivery of an audit remains confidential between SALSA and the member. However, any information received that indicates potential fraud or criminality shall be shared with the relevant authorities (e.g., the Food Standards Agency or EHO Primary Authority). Any requests by Authorities for information concerning food safety prosecution must be released in line with UK legislation.

We may collect, use, store and transfer different kinds of personal data about you in the following areas:

- **Identity Data** may include first name, last name, username or similar identifier, title and gender.
- **Contact Data** may include billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include bank account and payment card details.
- **Transaction Data** may include details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** may include internet protocol (IP) address, your login data, 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 our website.
- **Profile Data** may include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use our Websites, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect

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Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. (For example, if Scheme members fail to provide data we have requested under the Membership Rules, we may not be able to administer your membership of the Scheme and may have to cancel your membership: we will notify you if this is the case at the time.)

3. HOW 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 are about to enter into or have entered into with you.
- 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.
- Where we have your consent.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than to send newsletters or other direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We may use your internet provider address/domain name or computer IP address to collect anonymous aggregated statistics regarding numbers of visitors, countries of origin, pages visited, machine information and other similar site statistics. We may also record the URL you just came from and which URL you next go to when entering and leaving our website. These statistics cannot be traced back to individual users. We use them to ensure that we provide good service to our users and keep track of and resolve any technical difficulties. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities, we may collect such information in a file specific to you.

4. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

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You will receive marketing communications from us if you have requested information from us or purchased from us or if you provided us with your details when you registered for a webinar or a training course and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

SALSA never sells or otherwise passes on your personal information to third parties.

Opting out

You can ask us to stop sending you marketing messages at any time by clicking the opt-out button in the SALSA marketing emails or email info@salsafood.co.uk.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Change of purpose

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email info@salsafood.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis for doing 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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers acting as processors based in the UK who provide IT, marketing and system administration services.
- Service providers for the management of email marketing lists and campaigns.
- Professional advisers including auditors, mentors and consultants who provide audit services.
- Government inspectors, Trading Standards, Food Standards Agency, and similar authorities in order to review the status of Scheme members, or where a Scheme assessor comes across evidence of an immediate and significant risk of unacceptable food safety or potential illegal activity.
- Industry bodies with a legitimate interest in checking the status of Scheme members

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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.

6. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

7. 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

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, accounting, or reporting 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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

In some circumstances you can ask us to delete your data.

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9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. See your rights below:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please **email info@salsafood.co.uk**

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.

10. DATA PROTECTION REGISTRATION

SALSA is registered with the Information Commissioner in accordance with the Data Protection Act 2018

11. QUERIES

You may obtain further information on the ways in which SALSA uses personal data by emailing your query to info@salsafood.co.uk

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Approval

This document was originally issued by SALSA operations on 05/03/2014

This revision version was approved for application on: **03/06/2024**

Availability

This document is made available via the salsafood.co.uk website to the following stakeholders:

Advisory Board	No
Technical Advisory Committee	No
Auditors/Mentors	No
Members	No
Buyers and Specifiers	No