

# Lupa Foods Ltd:

## GDPR & Privacy Policy

### Who are we?

This website [www.lupafoods.com](http://www.lupafoods.com) (the “Website”) is owned and operated by Lupa Foods Ltd, Lupa Foods Ltd, Suite A31 (3rd Floor), Elstree Tower, Borehamwood, Herts, WD6 1SD, registered in England and Wales under Company Registration number 04934963. Any references to “we”, “our” or “us”, refer specifically to Lupa Foods Ltd.

### Purpose of the Policy:

This Privacy Policy explains the information that we collect about you when you visit our Website or otherwise provide us with information.

It also informs you how you can exercise your rights within the process, including the right to object to the way we undertake your data handling.

### What personal data do we collect?

Lupa Foods only collects personally identifiable information about you (i.e. your name, address etc.) through our website when it is voluntarily submitted by you, the visitor.

Providing personal information is your choice as a visitor to the Lupa Foods website. If you do not want your personal information to be collected, then it is your choice not to submit.

We also provide an “opt-out” should visitors wish to cease receiving emails or other communications from Lupa Foods.

### How do we collect the data?

Lupa Foods collects standard internet log information and details of visitor behaviour patterns.

We use ‘cookie’ technology and IP addresses to obtain solely non-personal information from online visitors to provide them with a tailored online experience. To do this, we keep track of the browser type (e.g. Internet Explorer, Firefox) and operating system (e.g. Windows, Apple) used by the visitor, and the domain name of the visitor’s Internet Service Provider.

### How do we use the data?

We use any data collected for the sole purpose of our legitimate interests of improving the site and the customer experience overall. The data helps us understand how many people are coming to the site, and which areas are of most interest. We use Google Analytics to assist with the analysis, but it is strictly processed in a way that ensures user anonymity.

Lupa Foods is compliant with GDPR process at all times, and strict procedures are in place to prevent the loss, misuse or alteration of the collated information, and to make such information as secure as possible against unauthorised access and use.

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### Who do we share this information with?

We share your data with contracted service providers, but otherwise will not share your information with any third party unless:

- We have your permission;
- We are required to do so by law;
- This is necessary so that we can enforce our terms of use, rights or property or the rights or property of any third party; or
- This is necessary in connection with the sale of our business or its assets (in which case your details will be disclosed to our advisers and any prospective purchaser's advisers and will be passed to the new owners)

### How long do we keep this information for?

We only keep information for a duration of reasonable commercial interest, and if we have no contact with you for a reasonably considered period we will archive all data for file or may delete it.

### HR data protection

Personal Data is also collected in order for Lupa Foods to undertake recruitment. Data collected is used for the purpose of our legitimate interests. This data will include the information supplied on all submitted CV's (name, address, date of birth, qualifications), and will under no circumstances be shared with third parties.

Personal data of this nature is only ever accessed by Lupa Foods staff, and we make data security paramount within all our commercial activities.

We are required by law to hold your Personal Data as long as is necessary to comply with our statutory obligations, and will undertake regular auditing to ensure that any personal data that we hold is maintained and up to date.

If we have no contact with you then following the expiry of a period as we consider appropriate we will archive for file or may delete it.

### Any Questions?

Questions, comments or requests concerning this privacy notice are welcomed and should be addressed to Simon Bell, CEO, at [simon@lupafoods.com](mailto:simon@lupafoods.com)

If you have a concern about the way we handle your personal data you have the right to complain to the Information Commissioner (ICO). You can find details of how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

This privacy notice was last updated on 28.1.20.