

## WELCOME TO OUR PRIVACY POLICY

### Who we are

For the purpose of the Regulation (EU) 2016/679 as adopted by the European Union (Withdrawal) Act 2018 and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) and supplemented by as supplemented by Data Protection Act 2018 (the "UK GDPR", "Legislation"), the data Controller is North Food Ltd whose registered office is situated at CentralPoint, 45 Beech Street, London EC2Y 8AD.

We are a registered data controller with the UK Information Commissioner's Office. You can find our details under registration number ZB192187.

We are committed to protecting and respecting your privacy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.northfish.com](http://www.northfish.com) (our "Website") you are accepting and consenting to the practices described in this policy.

### Contact

If you have questions about how we process personal data, or would like to exercise your rights, please write to us at our registered office or email us at: [contact.uk@northfood.co.uk](mailto:contact.uk@northfood.co.uk)

### Data collection

When you use our Website we may collect information about you. Some of your personal data is collected directly, including your name, address, date of birth, email address, telephone number, for example when you send an email to us, completing forms on the Website, when you register with our online services, log-in to Wi-Fi or enter one of our competitions. The transaction information, including information about the products you buy, method of payment and payment details. We will not store information which will be processed and stored by our payment providers in accordance with their privacy policies. Other personal data is collected indirectly, when you visit our Website or use our online services. This information may refer to "cookies" (described below) and include technical information like your computer's Internet Protocol (IP) address, your browsing activity, date and time of access of our online services or in-restaurant technology, name and URL of the file retrieved when you use our online services, type of mobile device.

We may collect information about you from other companies such as analytics or marketing providers. We may also collect information that is publicly available, for example on social media platforms.

The above is not an exhaustive list and, in specific instances, we may need to collect additional data for the purposes set out in this policy.

### Purposes and Data Retention

We collect and (or) process personal data from you for one or more legitimate purposes, including the following:

- a) For market research and customer service to better understand how our visitors use our services and how we may improve your experience of our Website in future;
- b) To provide our services, fulfill orders, and process payments for our products and services in our restaurants;
- c) To administer our Website;
- d) To manage our business, including developing new products and improve our offers;

- e) To process any request you may have made, provide customer support and communicate with you;
- f) To verify your identity;
- g) To carry out our obligations arising from any contracts entered into between us;
- h) For the purpose of legal compliance for crime and fraud prevention, detection and related purposes.

We will retain your personal information in accordance with the UK GDPR and no longer than is necessary. The criteria that we use to determine retention periods and the nature of the grounds for processing your personal information will be determined by the nature of the data and the purposes for which it is collected on one of the following basis:

- a) Where you have given Consent (e.g. for obtaining feedback or marketing purposes) - we will continue to process your personal information until you withdraw your consent,
- b) Where it is required for Legitimate Interests of the Organisation - we will use your personal information to ensure that we are providing you with the product and service you require, to comply with our contractual relationship with you, to identify the products that may be of interest to you, to develop our relationship with you, to understand your needs, actions preferences and expectations, to assess the quality of service and analyse any complaints, to monitor and improve our business processes, to perform financial, regulatory and general accounting and reporting, to perform risk management, to confirm your identity, to resolve disputes or to protect our rights. We will continue to process or store your personal information until the Legitimate Interest no longer exists. Typically this will be on expiry of any relevant limitation period after our contractual relationship comes to a conclusion.
- c) Where it is necessary to Comply with Our Legal Obligations - To investigate and resolve complaints, to conducting investigations into potential breaches of policies by our employees, to managing contentious regulatory matters, to notifying our insurers in cases of claims or potential claims, to notifying you of any changes to our policies or terms and conditions, to comply with your requests where you have exercised your rights as detailed in this privacy notice, to confirm your identity using the information and documents that you have provided, to perform reporting and checks for the purposes of preventing and detecting crime and to comply with anti-money laundering regulations as well as laws against fraud, terrorism financing, bribery and corruption and international sanctions, to share information with law enforcement agencies and other authorities where we have a legal obligation to do so, to share information with third parties where we have been ordered to so by the court or it is required by any statutory or legal instrument or to comply with our financial or legal reporting obligations. We will continue to process or store your personal information until this requirement no longer exists. Typically this will be on expiry of any relevant limitation period after our contractual relationship comes to a conclusion.

#### CCTV Footage

CCTV may be used in North Food's premises for legitimate business interests, which includes the following: to prevent or detect crime and disorder, to provide evidence in the event of legal proceedings by or against our Company, to ensure restaurants are being run in a safe manner, to ensure operational effectiveness.

#### Your Rights:

We want to ensure that you are fully informed about your rights in respect of any personal information that we hold and process about you. You have the following rights in respect of your personal information:

- a) The right to be informed about the collection and use of your personal data - please note that this policy notifies you of the collection of your personal information. Should you wish to access the personal information that we hold about you, please contact us.
- b) The right to access – you have the right to access the information that we hold about you. We have a period of one calendar month to provide you with information however if we hold a large amount of data or the request is complex we may request a further two calendar months. In order to reduce processing time and ensure that we can get copies of the information to you as quickly as possible please be as specific as possible. If you require all of the information we hold, please say so. You do not need to pay a fee to gain access to your personal information.
- c) The right to correction – If you have noticed that any information that we hold about you is inaccurate, you have the right to require us to correct the information we hold.
- d) The right to restrict processing or object to processing of your personal information - you have the right to object to us processing your personal information or to limit the way we use the information we hold about you. You can request that we stop using the personal information that we hold about you for a particular purpose or purposes or altogether. If you object to or wish to restrict the way we process your personal information you should contact us stating so. In particular if you believe that we are not using your information in a lawful manner or we no longer need to process your information for the purposes for which it was provided or the information we hold is inaccurate you should ask for the processing to be restricted. We may refuse to comply with your request if we can demonstrate that there are legitimate reasons for doing so (such as Legitimate Interests of the Organisation or it is necessary for our Compliance with our Legal Obligations). The burden is on us to demonstrate this.
- e) The right to erase your personal information - you have the right to request that we erase the personal information that we hold about you. You should do so if you believe that we are not using your information in a lawful manner or we no longer need to process your information for the purposes for which it was provided or you wish to withdraw your consent to us retaining and processing your personal information. We may refuse to comply with your request if we can demonstrate that there are legitimate reasons for doing so (such as Legitimate Interests of the Organisation or it is necessary for our Compliance with our Legal Obligations). The burden is on us to demonstrate this.
- f) The right to data portability - you have the right to access the personal information we hold in a portable format that you can reasonably expect to be able to easily access.
- g) The right to transfer your personal information to another party - you have the right to request that we transfer your personal data to a third party;
- h) The right to object to direct marketing - you have the absolute right to object to us processing your personal information for direct marketing and you may opt out of any marketing materials at any time.
- i) The right to withdraw consent - where we rely on your consent to process your personal information, you have the right to withdraw this at any time.
- j) The right to object to automated decision making including profiling - you have the right to object to your personal information being used in this manner.

If you wish to exercise any of your rights, please contact us using the contact details at the outset of this document. If we are unable to comply with any of your request, we will provide detailed reasons for this explaining why we believe any of the exemptions apply.

You will always have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who are the UK supervisory authority for data protection issues. We do however encourage you to contact us in the first instance to resolve any issue you may have

Your consent

You have the right to withdraw your consent to the processing at any time. Please note that such withdrawal will not affect the lawfulness of any processing carried out before you withdraw your consent.

There will be circumstances where we may also rely on other valid legal grounds for the processing of your personal information, such as legitimate interests of the organisation or compliance with our legal obligations.

#### Who we may share with

Your personal information may be disclosed to our affiliates, our group companies. This may be done for legitimate interests of the organisation and in order to fulfil our contractual obligations to you, such as fulfilling orders or providing data processing, managing promotions, carrying out research and analysis, to us and our group.

We may also share your personal information with third parties where we have your express permission to do so, sharing your personal information is contractually necessary for us to fulfil our obligations to you, we are legally obligated to share your personal information or sharing your personal information falls within the legitimate interests of the organisation, such as for the purposes of debt tracing and debt recovery.

Your personal information may be disclosed for processing to government bodies, public authorities and law enforcement agencies and in response to other legal and regulatory requests.

We may transfer your personal information to a third party in countries outside the country in which it was originally collected, however if we do so we will ensure that adequate safeguards are in place to so that your personal data is protected to at least the same standard as set out in our policies.

If we transfer your personal information to the third party we will ensure that any data processor who will process your personal information will afford at least the same level of protection as our policies.

#### Automated decision-making

It takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so.

#### Security Measures

We have put in place suitable security controls to safeguard data collected via this Website to protect your data. Access to the information is limited and data processors which processes your data are obliged to respect the confidentiality of your personal information.

We endeavor to do our best to protect your personal data. However, the internet is not entirely secure medium and any transmission is done at your own risk.

#### Cookies

Like other commercial Websites, our Site uses a technology called "cookies" and similar technologies. Cookies and similar technologies can perform functions and personalise content. These are data about the user's visit, for example domain name, browser type, operating system type, IP address stored in the user's device. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Website, and the Sites visited just before and just after our Website.

We use Google Analytics to aggregate and analyze data about your use of our Websites. To opt out of Google's analytics services, please visit the Google website: <https://tools.google.com/dlpage/gaoptout/>  
To learn more about how Google collects and processes data, visit Google's website: <https://www.google.com/policies/privacy/partners/>

The collected information may be used for technical purposes related to the administration of our servers. IP addresses can also be used to collect statistical information (e.g. about the time and region from which the connection takes place). We may use the cookies which, by storing short text information on the user's computer, allows its identification and, consequently, enables the services and content offered by the Website to be adapted to the individual needs and preferences of the user, as well as to develop statistics.

These cookies are essential to enable you to move around our Website and use its features, such as accessing secure areas of the Website. Different cookies can last for different lengths of time. Session cookies contains information that is stored in a temporary memory location and then subsequently deleted after the session is completed or the web browser is closed. Persistent cookies are on your browser and may last for a year or until you delete them. They can personalise the Site and remember information each time you visit. You may, if you wish, deny consent to the placing of cookies. You can choose to enable or disable cookies in your internet browser. However it may cause some difficulties and certain features of the Website may not function fully or as intended, you may lose any information that enables you to access the Website more quickly and efficiently. More information about cookies can be found at: [www.allaboutcookies.org](http://www.allaboutcookies.org)

#### Third party cookies.

We are not responsible for the content or cookies from external websites. If you follow a link from our Website to a third party Site, they will have their own privacy and cookie policy. For further details, please consult the help menu in your internet browser.

#### Further information

Should you have any queries or complaints in relation to how we use your information, please contact us in the first instance using the contact details: [contact.uk@northfood.co.uk](mailto:contact.uk@northfood.co.uk) or write to us at the address above. If you wish to take any complaints you have the right to contact your local data protection regulator which, in the UK, is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))

#### Changes to this privacy notice

North Food Ltd reserves the right to update this privacy notice at any time, changes to this privacy policy will be posted on this Website.