

DATA PRIVACY AND PROTECTION POLICY

A document detailing the protection of data consumed within the organisation highlighting compliance and commitment to GDPR



Introduction

Turmeric Group respects your privacy and is committed to protecting your personal data. This data protection privacy policy will inform you as to how we look after your personal data when you visit and/or engage with our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Important information and who we are

1. Purpose of this policy

This data protection and privacy policy aims to give you information on how Turmeric Group collects and processes your personal data through your use of this website, including any data you may provide through this website when you complete any of the forms on our site.

This 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.

This notice also enforces our commitment and compliance with the General Data Protection Regulation (GDPR).

2. Controller

Turmeric Group is the controller and responsible for your personal data (collectively referred to as Turmeric Group, “we”, “us” or “our” in this privacy notice).

3. Contact details

Full name of legal entity: Turmeric Group Limited

Email address: admin@turmericgroup.com

Postal address: Brigham House, High Street, Biggleswade, Bedfordshire, SG18 0LD

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

4. Changes to the privacy and protection policy and your duty to inform us of changes

Should our policies ever change or be updated/amended you will be notified via email, and our updated policies and terms and conditions will always be on our website.

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.

5. Third-party links

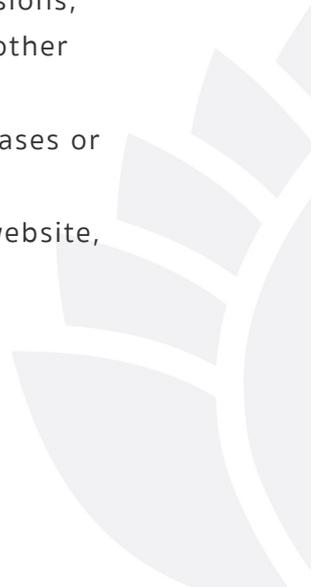
Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name.
- **Contact Data** includes email address.
- **Financial Data** – this may include your bank account and payment card details.
- **Transaction Data** – this may include details about payment between us and other details of purchases made by you.
- **Technical Data** – this may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** – this may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Data** – this may include information about how you use our website, products and services.



- **Marketing and Communications Data** – this may include your preferences in receiving marketing communications 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 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). Nor do we collect any information about criminal convictions and offences

1. If you fail to provide personal 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, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



How your personal data is collected

We collect personal data through a variety of different methods, including:

1. Direct engagement: We may receive your data when you fill out forms on our site, or when you communicate with us by post, phone, or email.
2. Technology engagement: We may automatically collect personal data in the form of technical data about your equipment, browsing actions and usage patterns. We use cookies to collect this data.
3. Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources including:
4. Technical Data from the following:
 - Analytics providers such as Google based outside the EU;
 - Advertising networks such as Facebook, Twitter, LinkedIn, Google Plus, based outside the EU;
 - Search information providers such as Google based outside the EU;
 - Contact, financial, and transaction data from technical, payment and delivery services such as PayPal, Stripe and Go Cardless based outside of the EU.
 - Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

E. 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 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 in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by unsubscribing.

1. Purposes for which we will use your personal data

Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table.

2. Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by unsubscribing at any time.

3. 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 contact us.

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.

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.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table found in the glossary, in reference to Section E.1 in this document.

- Internal third parties as set out in the Glossary

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.



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.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Descriptions of the below information can be found in the glossary.

- 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 contact us.

1. No fee usually required

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.

2. What we may need from you

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.

3. Time limit to respond

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.

Glossary

1. Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

2. Your legal rights

You have the right to:

- 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.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

3. Table of purposes which we use your data for

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|-----------------------------|--|
| To register you as a new customer | (a) Identity (b) Contact | Performance of contact with you |
| To manage our relationship with you which will include: | (a) Identity (b) Contact | (a) Performance of contact with you |

| | | |
|--|---|--|
| <p>(a) Notifying you about changes to our terms or privacy policy</p> | <p>(c) Profile</p> | <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p> |
| <p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> | <p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> |
| <p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p> | <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p> |
| <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> | <p>(a) Technical</p> <p>(b) Usage</p> | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p> |