

Vitacress Data Protection Privacy Statement

1. Who are we?

Vitacress is a Group of Companies (known as the 'Data Controllers') based out of Vitacress Limited, Lower Link Farm, St. Mary Bourne, Andover, Hampshire, SP11 6DB, and we process personal data relating to employees (including workers and contractors), customers, suppliers, visitors and other individuals. This means Vitacress decides how your personal data is processed and for what purpose.

Vitacress is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required. For further information on this and how to contact us, see section 20.

2. What are our terms of reference?

All references to "us", "we", "our" or "the company/business" throughout this Privacy Statement refers to Vitacress (as set out above). References to "you", "your" refers to the individual about whom Vitacress processes information. References to DPR mean the company 'Data Protection Representative'.

3. What are our aims?

Vitacress respects your rights to data privacy and understands the importance of ensuring it processes it in a secure manner. With this in mind we aim to adhere to this Privacy Statement by recognising and addressing our obligations under the provisions of relevant Data Protection Legislation.

Vitacress aims to ensure that all personal data collected about employees (including workers and contractors), customers, suppliers, visitors and other individuals is collected, stored and processed in accordance with the [General Data Protection Regulation \(GDPR\)](#) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the [Data Protection Bill](#).

This Privacy Statement applies to all personal data, regardless of whether it is in paper or electronic format.

4. What are our responsibilities?

This Privacy Statement applies to all individuals employed by Vitacress, to external organisations or individuals working and engaged on our behalf and to all other data subjects whose data we may process now and in the future.

4.1 Operating board

The operating board has overall accountability for ensuring that Vitacress complies with all relevant data protection obligations.

4.2 Data protection officer

Vitacress is not required to employ a data protection officer (DPO) and therefore our Data Protection Representative (DPR) is responsible for overseeing the implementation of this Privacy Statement, monitoring our compliance with data protection law and developing related policies and guidelines where applicable.

The DPR will report to the operating board giving their advice and recommendations on Vitacress' data protection issues.

The DPR is also the first point of contact for individuals whose data Vitacress processes, for the ICO and is contactable via the details provided in section 20.

5. How have we utilised data protection legislation and guidance?

This Privacy Statement meets the requirements of the GDPR. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#) and the ICO's [code of practice for subject access requests](#) (SARs).

It also reflects the ICO's [code of practice](#) for the use of surveillance cameras (CCTV) and personal information.

6. What are the GDPR data protection principles?

The GDPR is based on data protection principles with which Vitacress is required to comply. The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This Privacy Statement sets out how Vitacress aims to comply with these principles.

7. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the EU General Data Protection Regulation (GDPR) and relevant UK Data Protection Regulations.

8. What are your rights?

Unless subject to an exemption under the GDPR, you have the following rights with respect to the personal data that Vitacress holds about you:

- The right to request a copy of your personal data which we hold about you (see section 9 below)
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for us to retain such data, known as 'the right to be forgotten'
- The right to withdraw your consent to the processing at any time
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, known as 'the right to data portability'
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data

9. What are your subject access requests and other rights?

9.1 Subject access requests (SARs)

Individuals have a right to make a 'subject access request' to gain access to personal information that Vitacress holds about them.

Subject access requests are required to be submitted in writing, either by letter or email to the contact details in section 20. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

- include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill)
- For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent

If an employee receives a subject access request they are required to immediately forward it to the DPR.

9.2 Responding to SARs

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- Will provide the information free of charge
- May contact the individual via phone to confirm the request was made
- May tell the individual we will comply within 3 months of receipt of the request and may charge a fee, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary
- Will respond without delay and within 1 month of receipt of the request

10. Collecting and processing your personal data, why and how do we do this?

10.1 Collecting your personal data

We collect information about you when you become employed by us, send email communications both internally and externally, register on our site via the 'contact us' form, place an order or enter into a contract of service, provide information when you visit one of our sites or attend one of our events (in whatever capacity), which may include your:

- name
- email address
- telephone number
- job title
- employer name
- business activities or the nature of
- attendance at our sites or events
- details to which help us maximise your experience when engaging with you for whatever reason we do so

It is necessary for us to collect this information in order to communicate with you, provide our services to you, to process payment for such services and to provide the relevant content connected to any link with which you have interacted (as applicable).

10.2 Processing your personal data

We use your personal data for the following purposes (although we cannot list every possible purpose, we include all reasonable and foreseeable purposes):

- to manage and fulfil contracts for our employees, contractors, workers, suppliers and customers and other individuals engaged with the company
- to maintain our own accounts and records for legitimate business interests and historical reasons
- for the use of CCTV systems for the prevention of crime
- to operate company web sites effectively
- to comply with legal obligations
- to maintain standards of operating
- personalising your experience and to allow us to deliver the type of content and product offerings in which you are most interested
- allowing us to better service you in responding to your customer service requests
- sending you periodic emails regarding your order or other products and services
- following up with you after correspondence (live chat, email or phone inquiries)
- otherwise providing you with our services and to process payment for such services

- Personal data relating to children will only be processed by Vitacress where the organisation responsible and accountable for said children have obtained parental consent in accordance with the relevant data protection legislation, evidence of which must be provided to Vitacress

We will not provide your information to third parties other than as set out below in section 12.

10.3 Limitation, minimisation and accuracy of personal data

Whenever Vitacress collects personal data directly from individuals, the company will only collect what is necessary for specified, explicit and legitimate reasons.

Vitacress will only process personal data where it is necessary. When the data is no longer required, they will ensure it is securely deleted or anonymised. This will be done in accordance with the company's Data Retention Policy.

10.4 Biometric recognition systems

Vitacress uses biometric data as part of an automated recognition system (employees use finger prints to access buildings), we will comply with the requirements of relevant legislation.

10.5 CCTV

Vitacress uses CCTV in various locations around our sites for crime prevention and the safety of our employees/visitors. We will adhere to the ICO's [code of practice](#) for the use of CCTV. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

10.6 Photographs and videos

As part of our business activities, we may take photographs and record images of individuals. We will obtain written consent from individuals for photographs and videos to be taken of them or any data subject for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to the individual. Uses may include:

- notice boards and in publications, brochures, newsletters, etc.
- outside the company by external agencies e.g. photographer, newspapers, campaigns
- online on our internal and external website or social media pages
- Personal data relating to children will only be processed by Vitacress where the organisation responsible and accountable for said children have obtained parental consent in accordance with the relevant data protection legislation, evidence of which must be provided to Vitacress

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

11. What is the legal basis for processing your personal data?

11.1 Lawfulness, fairness and transparency

Vitacress will only process personal data where we have one of 6 legal reasons to do so as defined under GDPR, Articles 6 and 9.

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

12. With whom and why do we share your personal data?

We may use your data only for the purpose of conducting business and we may disclose your personal data to (including but not strictly limited to):

- our agents and service providers
- other relevant Vitacress employees
- exhibitors, speakers and other delegates at our events
- a third party who acquires the company

Vitacress shares data for the following reasons (including but not strictly limited to):

- where there is an issue that puts the safety of employees at risk

- where we need to liaise with other agencies – we will seek consent as necessary before doing this
- where our suppliers or contractors need data to enable us to provide services to our employees and data subjects – for example, IT companies.

We will also share personal data with law enforcement and government bodies where we are legally required to do so for (including but not limited to):

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

13. Do we transfer your personal data abroad?

Vitacress does not directly transfer personal data to any countries or territories outside of the EU however, a number of our third party processors may do so in order to provide us any relevant services which enable us to operate effectively. For details of how your personal data will be protected, together with how to obtain copies of the relevant safeguards please request this by contacting us on the information provided in section 20.

We will not transfer your data to any partners that operate solely outside of the European Economic Area (EEA).

14. What is our retention process?

Vitacress has implemented a Data Retention Policy and any personal data will only be kept for as long as legally permitted or until no longer required.

15. What is our record disposal process?

Personal data records that have become inaccurate, are out of date or are no longer required will be securely disposed of where we cannot or do not need to rectify or update. They will be stored and secured in a locked environment until our carefully selected third party shredding company are present to shred the documentation on site after which they provide us with a certification of destruction for each visit.

16. How will we prepare for and handle data breaches?

We will make all reasonable endeavours to ensure that there are no data breaches. In the unlikely event of a suspected data breach, we will follow Vitacress' Breach Response procedure.

17. What internal training do we provide?

All our employees are provided with data protection and/or privacy training as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation, guidance or Vitacress processes make it necessary.

18. How do we monitor this Privacy Statement?

The DPR is responsible for monitoring and reviewing this Privacy Statement.

This Privacy Statement will be reviewed and updated if necessary when the Data Protection Bill receives royal assent and becomes law (as the Data Protection Act 2018) – if any changes are made to the bill that affect our practices. Otherwise this Privacy Statement will be reviewed annually.

You should check this policy frequently on our website to ensure you are aware of the most recent applicable version.

19. What further processing do we do?

If we wish to use your personal data for a new purpose, not covered by this Privacy Statement, then we will provide you with a new Privacy Statement explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

20. How do you get in touch with us and the ICO?

Vitacress contact Information

To exercise all relevant rights, queries of complaints please in the first instance contact:
Telephone: 01243 819500 or Email: info@vitacress.com

ICO Contact Information

To log a complaint or for more information on your rights the Information Commissioner's Office can be accessed at: www.ico.org.uk