

ABC Food Law Ltd PRIVACY POLICY

Last modified: May 2018

1. Introduction

1.1 ABC Food law Ltd ("Company" or "We") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- *J* The identity of the data controller.
- What personal data is collected including the types of information we may collect or that you may provide when you access or use the ABC Food Law website (<u>www.abcfoodlaw.co.uk</u>) "the website".
- *)* How personal data is collected.
-) Why personal data is collected.
- / How we use personal data.
- How personal data is shared and with whom.
- What choices you have with respect to how personal data is used.
- How long personal data is kept.
-) Your rights with respect to personal data.

1.2 This policy websitelies only to information we collect through our website, via e-mail, text and other electronic communications sent through or in connection with this website.

1.3 Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. A SUMMARY OF THIS POLICY IS ALSO AVAILABLE. If you do not agree with our policies and practices, do not, register with or use this website. By downloading from, registering with or using this website, you agree to this privacy policy. This policy may change from time to time (see "CHANGES TO OUR PRIVACY POLICY"). Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

1.4 **Children under the Age of 13**: This website is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at

admin@abcfoodaw.co.uk

2. Identity of Data Controller

2.1 A data controller is a person or organization who makes decisions about how your personal data is used and handled.

2.2 ABC Food Law Limited is the data controller and may be contacted at:

- Post: Innovation Centre, Norwich Research Park, Norwich, NR4 7GJ
- e-mail: <u>admin@abcfoodlaw.co.uk</u>



3. What personal data is collected

- 3.1 We collect information from and about users of the website:
 - Directly from you when you provide it to us.
 - Automatically when you use the website.
- 3.2 We do not collect sensitive data such as information relating to or about:
 -) Health

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-) Racial or ethnic origin
-) Political opinions
-) Membership of a political association, professional or trade association
- / Membership of a trade union
-) Religious beliefs or affiliations
- *J* Philosophical beliefs
- *J* Sexual orientation or practices
- Criminal record
- *J* Biometric information

3.3 Information that you provide to us ("personal information") when you download from, register with or use this website may include:

- Name,
- Postal address,
- e-mail address,
- / Telephone number

3.4 In addition we may collect other information that is about you but individually does not identify you, such as gender.

3.5 This information may also include:

- Information that you provide by filling in forms on the website. This includes information provided at the time of ordering a subscription to our online services, booking on a training course or by using our contact us form.
- We may also ask you for information when you complete user surveys and when you report a problem with the website.
- Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us.
- \int Your responses to surveys that we might ask you to complete for research purposes.

3.6 Third-party Information Collection

3.6.1 When you use the website or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:



- Advertisers, ad networks and ad servers.
- Analytics companies.
- *)* Your mobile device manufacturer.
- *J* Your mobile service provider.

3.6.2 These third parties may use tracking technologies to collect information about you when you use this website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, websites and other online services websites. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

3.6.3 We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

3.6.4 For information about how you can opt out of receiving targeted advertising from many providers, see Section 8.

4. How personal data is collected.

4.1 Automatic Information Collection [And Tracking].

4.1.1 When you download from, access and use the website, it may use technology to automatically collect:

- Usage Details. When you access and use the website, we may automatically collect certain details of your access to and use of the website, including traffic data, location data, logs and other communication data and the resources that you access and use on or through the website.
- Device Information. We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information and the device's telephone number.
-) Location Information. This Website collects real-time information about the location of your device. We do not, however, continually collect user location data nor do we collect location data without the user being aware. We store the location of a user at set points for example to monitor the use of our webinars. Some of our location-enabled Services require your personal data for the feature to work. By using the Website you consent to your data being used for this purpose. You can withdraw your consent at any time by contacting us.Note, however, that opting out of the Website's collection of location information will cause its location-based features to be disabled.

4.2 If you do not want us to collect this information do not download from or use the Website. For more information, see section 8.



4.4 Information Collection [And Tracking] Technologies.

4.4.1 The technologies we use for automatic information collection may include:

- Cookies (or mobile cookies). A cookie is a small file placed on your smartphone or device. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone or device. However, if you select this setting you may be unable to access certain parts of our Website.
- The cookies we use include "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
-) These cookies are used to collect information about how visitors use our site. We use the information to compile reports on general user traffic, conversion statistics and to help us improve the site. The cookies collect information anonymously.
- Please note that our advertisers may also use cookies, over which we have no control.
- Web Beacons. Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (or example, recording the popularity of certain website content and verifying system and server integrity.

5. Why personal data is collected.

5.1 Personal data is collected by us for the following reasons:

-) To confirm bookings onto our training courses
- J To set up and operate accounts to our online training service
-) To ensure that you get the best out of using the website.

6. How we use personal data

6.1 We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Website and its contents, and any other information, products or services that you request from us.
- *J* Fulfill any other purpose for which you provide it.
-) Give you notices about your account, including expiration and renewal notices.
-) Ensure that content from our Website is presented in the most effective manner for you and for your computer or device for accessing the Website.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Website updates are available, and of changes to any products or services we offer or provide though it.
-) To manage your account, including processing payments and refunds via PayPal.



6.2 The usage information we collect helps us to improve our Website and to deliver a better and more personalized experience by enabling us to:

-) Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Website.

6.3 We use location data for the following reasons:

) to monitor use of our online services including our webinars.

6.4 We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

6.5 The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

6.6 Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

6.7 If you suspect that there has been a breach of the security of your data you should contact us at: admin@abcfoodlaw.co.uk and include details of:

- the nature of the breach;
- the date of the breach;
- the full circumstances of the breach.

6.8 On notification of such a breach we will investigate the matter and, where appropriate and required by law, notify the relevant Data Protection Regulator.

7. How personal data is shared and with whom.

7.1 You may provide information or comments to be published or displayed as part of our webinar service. We cannot control the actions of third parties with whom you may choose to share your comments(other webinar users). Therefore, we cannot and do not guarantee that your comments will not be viewed by unauthorized persons.



7.2 We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

7.3 In addition, we may disclose personal information that we collect or you provide:

-) To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
-) To fulfill the purpose for which you provide it.
- *For any other purpose disclosed by us when you provide the information.*
- *For the purposes of academic research*
- For any other purpose with your consent.
- J To comply with any court order, law or legal process, including to respond to any government or regulatory request.
-) To enforce our rights arising from any contracts entered into between you and us.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

8. What choices you have with respect to how personal data is used.

8.1 We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information. You may need to adjust the settings on your device to restrict the collection of information by the Website but this may prevent you from accessing all of the features of the Website.

- Tracking Technologies. You may be able to set your browser or device to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Website may then be inaccessible or not function properly
- Location Information. You can choose whether or not to allow the Website to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the Website may then be inaccessible or not function properly.



- Promotion by the Company. If you do not want us to use your e-mail address or other contact information to promote our own products or services, you can opt-out by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an e-mail stating your request to <u>admin@abcfoodlaw.co.uk</u>
- Targeted Advertising by the Company. We do not use information that we collect or that you provide to us to deliver advertisements.
- Disclosure of Your Information for Third-Party Advertising and Marketing. We do not share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes

8.2 We do not control third parties' collection or use of your information to serve interestbased advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

9. Your rights with respect to personal data.

9.1 You can review and change your personal information by logging into the Website and visiting your account settings page.

9.2 You may also send us an e-mail at <u>admin@abcfoodlaw.co.uk</u> to request access to, correct or delete any personal information free of charge that you have provided to us. We cannot delete your personal information except by also deleting your user account.

9.3 We will respond to a request to access, correct or delete any data within 30 days.

9.4 We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

9.5 If, on your request, we refuse to amend, correct or delete your personal information, we will set out our reasons for not doing so and provide you with details of how you may complain about our refusal.

9.6 If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use.

10 How long personal data is kept.

10.1 We will only retain personal data for as long as is necessary.

10.2 All personal data will be removed within 90 days of the deletion of an account.

11. Changes to Our Privacy Policy

11.1 We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page with a notice that the privacy policy has been updated.



11.2 The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

12 Contact Information

12.1 All questions, comments and requests regarding this Privacy Policy should be addressed to the contact details as set out in the Website or by e-mail to admin@abcfoodlaw.co.uk