



The Truckle Cheese Co.

Privacy Policy – Protecting your Personal Information

This Privacy Notice explains what to expect in relation to ‘Personal Data’ information we hold about you, your ‘Personal Information’. It explains what Personal Data we may collect, handle, process and store. The processing of your Personal Data is governed by the General Data Protection Regulations (the ‘GDPR’).

What is the GDPR and our Privacy Policy?

GDPR is a regulation in EU Law on data protection and privacy which replaces the 1995 Data Protection Directive. The regulation requires that the following eight data protection principles are followed in the handling of personal data:

1. Fairly, transparently and lawfully processed.
2. Obtained and processed for limited purposes and not in any manner incompatible with those purposes.
3. Adequate, relevant and limited to only data that is necessary to perform the purpose for which it was obtained.
4. Accurate and up to date.
5. Not kept for longer than is necessary.
6. Processed in accordance with the data subject’s rights.
7. Secure.
8. Not transferred outside of the EEA or between countries without adequate protection.

We are committed to following these principles and will be open and transparent about the purposes we will use your data.

Who are we?

The Truckle Cheese Co. is the data controller, meaning we decide how your personal data is collected, handled, processed and stored and for the purpose of. If any of your personal information changes, you believe that any of the information we hold is incorrect or you have any questions with regards to your personal information or our data protection policies and procedures, please contact us at enquiries@trucklecheese.co.uk

What is Personal Data?

‘Personal Data’ is any information relating to an identified or identifiable *natural* person (known as the ‘data subject’); an identifiable natural person is anyone who can be identified, directly or

indirectly from the data. Identification can be by the information alone or in combination with other information that is within our possession, control or from other information to which we legally have access to.

What are the legal basis' for processing your Personal Data?

To enable us to process your Personal Data, one or more of the following legal basis must be apparent:

- Consent from the individual (or an authorised person on their behalf).
- Where it is necessary to fulfil any contractual obligations and an individual or an authorised individual whom we have a contractual relationship with.
- Where necessary because of a legal obligation – when the law says we must.
- Where necessary in an emergency, to protect an individual's 'vital interests'.
- Where it involves the exercise of a public function – involving activities of most government, local government and other public bodies.
- Where necessary in both our legitimate interests.

What we do to protect your Personal Data?

We aim to protect all your Personal Data and comply with the obligations outlined above under the GDPR, by:

- Keeping Personal Data accurate and up to date.
- Only storing information in secure places.
- Destroying information that is no longer required/relevant.
- Not collecting or retaining unnecessary data or excessive amounts of.
- Protecting Personal Data from disclosure, unauthorised access, loss and misuse.
- Ensuring that measures are in place to keep secure and protect all Personal Data.
- Ensuring that we undertake suitable due diligence checks on third parties who have a legal requirement to process Personal Data provided by us.

We have a legal obligation under GDPR, that we must notify any data breach to the controller without undue delay. [The Truckle Cheese Co.](#) has processes and procedures in place for identifying, reviewing and promptly reporting any data breaches that it finds, to the relevant controller.

What we use your Personal Data for?

- To fulfil our contractual obligations to businesses or individuals, for goods and services that have been requested/provided.
- To verify identity, which may include natural persons where a contractual relationship is proposed or exists, to allow us to assess credit and or other commercial risks to our business.
- Keep you up to date with information, news, events and business activities that are relevant to the goods or service that we are contractually providing to you or consuming from you (please see section below in relation to 'Marketing Consent').

Who else has access to your Personal Data?

'The Truckle Cheese Co.' is a trading name of **RJC Enterprises Ltd** and to enable our business to operate efficiently, the data stored will share the same systems, controls and management, this supports our 'legitimate interests' as a business.

To enable us to provide you with goods and services that we have agreed to provide, there are a number of third parties who we may need to provide your Personal Data to, to enable us to fulfil your requirements.

- Product and service providers whom we may be contractually obligated to engage with on your behalf.
- Insurance providers and intermediaries whom we source to mitigate risks to our business.
- Licensed credit reference agencies.
- Other third parties, based upon our 'legitimate interests' as a business for example, data software systems, for accounts purposes and courier software systems for delivery requirements.
- Any statutory, governmental or regulatory body that requests Personal Data and that we have an obligation by Law or regulation, to provide the data to.
- Once your Personal Data has been passed to the third party, the third party would then become the 'Data Controller' of any Personal Data provided to them either by your or by us. If your engagement with **The Truckle Cheese Co.** were to end, this would not end your engagement with the third party.

How long will we keep your Personal Data for?

We keep your Personal Data for no longer than reasonably necessary; however there are circumstances when we may retain Personal Data for a longer period, for example:

- Where we have a statutory or regulatory obligation to retain the Personal Data.
- To ensure through 'legitimate interest' that our business is run in an efficient and compliant manner.

Your rights as a 'Data Subject'

You have the following rights in respect of your Personal Data, unless subject to an exemption under the GDPR, as follows:

- To request a copy of all Personal Data which we hold about you.
- To request any corrections of your Personal Data, if it is found to be inaccurate or out of date.
- To request some or all of your Personal Data to be erased, unless there is a legitimate reason for us not to comply (we will provide you with more details about your Rights in a response to your request). This is known as an Erasure – Right to be forgotten).
- To transmit that data directly to another Data Controller.
- To lodge a complaint with the Information Commissioners Office.

If you wish to exercise any of your rights, please see our 'Contact Details' section below.

Special Categories or 'Sensitive' Data

Special category data is Personal Data which the GDPR says is more sensitive and needs more protection. For example, information about an individual's:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics (where used for ID purposes)
- Health
- Sex life
- Sexual orientation

Any request for Personal Data within these special categories we must have a lawful basis for processing (in the same way as for any other type of Personal Data) under Article 6, but would also need to satisfy a specific condition under Article 9 of the regulation. This is due to special category data being more sensitive and could create more significant risks to an individual person's rights and freedoms.

Contact Details

To exercise all relevant rights, queries or complaints please contact:

Email: enquiries@trucklecheese.co.uk

Phone: 01638 741588

Post: The Truckle Cheese Co. PO Box 1247, Cambridgeshire CB25 0XA

You can also contact the Information Commissioners Office on 0303 123 1113 or via email

<https://ico.org.uk/global/contact-us/email/>

Or by post to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF