

Welcome to the Culina Group Privacy Notice

This information has been produced to help you understand everything you need to know about the way Culina Group collects, uses and shares personal data, what your legal rights are and how to exercise them.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

Culina Group takes its responsibility of protecting your data very seriously and we do advise you get to know our practices – If there's anything here you don't understand or if you want to ask any questions, please feel free to contact us (detail are at the end).

Who is the Data Controller?

We are Culina Group, a UK limited company registered in England.

Registered address: Culina Group Limited, Shrewsbury Road, Market Drayton, Shropshire, TF9

3SQ

Registered number: 05525931

In this document Culina Group may be referred to as "we", "us", or "our".

What kinds of personal data does Culina Group process?

Culina Group collects personal data for specific purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect are:

If you are a:	We may process these types of personal data:
Job Applicant	Name, address, telephone, email, work and education history,
Client (reseller)	Name, address, telephone, email,
Prospect	Name, telephone, email,
Client (manufacturer)	Name, address, telephone, email, bank details, VAT registration, company information
Supplier	Name, address, telephone, email VAT Registration
Sub-Contractor	Name, address, telephone, email, bank details, tax information

What are the purposes Culina Group collects personal data for?

Culina Group uses personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for the organisations' financial commitments, or to relevant financial authorities
- To comply with regulatory requirements and any self-regulatory schemes
- To carry out required business operations and due diligence (E.g. administration, reorganisations, security, investment or corporate/asset sales)
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or



of discrimination, or any other claim whereby the organisation may have to defend itself

We will also process personal data to achieve our various legitimate business interests; these are purposes that have been defined by us where we have balanced the necessity on our part to process the data for each purpose against your own expectations, interests and legal rights.

Our legitimate interests for processing personal data are:

- To provide you with goods and services you are looking for
- To inform you of other goods and services we provide, or offers that may interest you (direct marketing)
- To notify you of any changes to the goods and/or services we provide, or have provided, that may affect you
- To investigate any insurance claims
- To protect the company's assets

Where does Culina Group obtain personal data from?

We will collect personal data directly from you in various ways. This could include when you complete an online form, or if you provide the data directly to a representative of Culina Group.

Who will Culina Group share your personal data with?

We may share your personal data with the other members of our group of companies, which includes any subsidiary or the holding company (each as defined by the Companies Act 2006) of Culina Group.

In order to achieve the above stated purposes for which we process your personal data, we may have to share your personal data with some specific third-party organisations.

We shall make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The specific types of third-party Culina Group may share your personal data with include:

The Logistics People Limited, a member of the Culina Group, for further employment opportunities.

Culina Group is not responsible for the data protection compliance of any of these third parties.

If we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

Where will Culina Group store your personal data?

Culina Group will not transfer your personal data to any country outside the European Union (EU) other than those that have been granted an adequacy decision under the General Data Protection Regulation.

We may however share your personal data with third-party organisations who then intend to transfer the data outside the EU. We shall take all reasonable measures to ensure those third parties are also compliant with data protection law.

How long will Culina Group keep your personal data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria apply that determine the period for which we will store your personal data:



- Until we are no longer required to do so in order to comply with any regulatory requirements or financial obligations that we are subject to.
- Until we are no longer required to do so by any law it is subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Culina Group we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

The Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using our details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Culina Group to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or by visiting their website - https://ico.org.uk/concerns

Culina Group contact details:

Culina Group Limited

Shrewsbury Road Market Drayton Shropshire TF9 3SQ

T: 01630 695000

@: DataProtection@culina.co.uk

Who is the Culina Group Data Protection Officer?

Ametros Group Ltd

Lakeside Offices, Thorn Business Park, Hereford, England, HR2 6JT 0330 223 2246 dpo@ametrosgroup.com