

Introduction

Welcome to the Muntons plc privacy policy.

Muntons plc respects your privacy and is committed to protecting your personal data. This privacy policy tells you about how we look after your personal data, what privacy rights you have and how the law protects you.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy tells you how Muntons plc collects and processes your personal data when you: visit our website; enquire about or purchase our products or services (including where you or your employer is a stockist of our products or when you are otherwise acting on behalf of your employer); supply us with products or services (including when acting on behalf of your employer); visit our offices; interact with us at trade shows, conferences or exhibitions; or communicate with us by email, telephone, letter or on social media. It also explains how we use personal data to promote our products and services.

Our website and the products and services we provide are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

Controller

Muntons plc (company registration number: 176992) is the controller and responsible for your personal data (referred to as "Muntons", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

You can contact us in the following ways:

By email: data.protection@muntons.com

By post: Muntons plc, Cedars Maltings, Stowmarket, Suffolk IP14 2AG

By telephone: 01449 618300

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.

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

We keep our privacy policy under regular review. This version was last updated in March 2021. If you would like a copy of an older version of our privacy policy, please contact us.

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.

Third-party links

This 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 policy of every website you visit.

2. 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 as follows:

- **Identity Data** includes first name, last name, residential address, username or social media handle, marital status, title and gender and details relating to your business or employment.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **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 policy.

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.

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 our products 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.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms (either on our website or via other media) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Request further information from us including in respect of our products, services or downloads;
 - Place an order for our products or services (including where you or your employer is a stockist of our products or when you are otherwise acting on behalf of your employer);
 - Supply products or services to us (including where such supply is made by you or on behalf of your employer);
 - Request marketing be sent to you;
 - Interact with us at trade events such as conferences or exhibitions;
 - Give us feedback or contact us; or
 - Post content on our social media.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers (Google);
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
 - Identity and Contact Data from your employer or from individuals who you have worked with or for in the past;
 - Identify and Contact Data from organisers of events such as conferences, trade shows and exhibitions that we attend or sponsor; and
 - Identity and Contact Data from publicly available sources such as Companies House, LinkedIn, trade journals and industry publications and websites.

4. **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 a 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 obligation.
- Where you have provided your consent.

Generally, we do not rely on consent as a legal basis for processing your personal data although, where we are required to do so, we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your 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 below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To create a new customer account for you	(a) Identity (b) Contact	Necessary for our legitimate interests (to manage our business and to provide our products and services)
To enter the details of you, your business or your employer where you ask to be included on our list of stockists	(a) Identity (b) Contact	Necessary for our legitimate interests (to effectively distribute our products and grow our business)
To process and deliver your order for our products and/or services including to: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage our business transactions and recover debts due to us)
To manage our relationship with you which will include responding to correspondence, notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<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 (b) Contact (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) (b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (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>
<p>To send you marketing communications and information about our business, products and services</p>	<p>(a) Identity (b) Contact (c) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Where you have provided your consent (if appropriate)</p>
<p>To enhance or correct the information we already hold about you or your employer organisation</p>	<p>(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications</p>	<p>(a) Necessary under our legitimate interests to develop and inform our business and marketing strategy (b) Necessary to comply with a legal obligation</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Transaction, Usage and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing.

You may also receive marketing communications from us where we have obtained your details from any publically available source.

Third-party marketing

We will not share your personal information with third parties for marketing purposes.

Opting out

You can also ask us to stop sending you marketing messages at any time by clicking on the unsubscribe link you will find at the bottom of each marketing communication we send you or by contacting us.

Where you opt out of receiving our marketing messages, we will still contact you in relation to any orders you may have placed for our products or services (including those ordered by you on behalf of your employer organisation) or that we are purchasing from you (or your employer) and to manage our relationship with you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the following purposes.

- Third party service providers which provide the services that help us keep our business running, such as printing services, email services, website and IT hosting and support, delivery services and marketing services;
- Professional advisers such as lawyers, accountants and insurers;
- HM Revenue and Customs, regulators and other authorities;
- Other entities within our distribution or supply chain such as logistics providers, sales agents and stockists for the purposes of managing the supply of our products and services;
- Other entities within the wider Muntons Group which are based in Thailand and need the data for such purposes as managing and fulfilling orders for the supply of our products and services and developing our products and services to grow our business;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

6. INTERNATIONAL TRANSFERS

We share your personal data within the wider Muntons Group. This will involve transferring your data outside the UK.

Some of our external third parties are based outside the UK so their processing of your personal data will also involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. AUTOMATED DECISION MAKING AND PROFILING

We do not make use of any automated decision making or profiling.

8. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may 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 your personal data.** 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.
- **Object to processing of your personal data.** This enables you to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal data.** This enables you to 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:
 - If you want us to establish the data’s accuracy.

- Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data.** This enables you to 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, with 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.** This enable you to 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.

If you wish to exercise any of the rights set out above, please contact us using the details set out at the beginning of this policy.

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 could refuse to comply with your request in these circumstances.

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.