



Privacy Policy



Introduction

Snacks Développement SAS known as Europe Snacks Group takes your privacy very seriously and is committed to protecting it.

We want you to understand how we collect and use information about you. We also value your comments about the way we do this.

The privacy policy describes to you:

- who we are
- Where is this site hosted
- what personal data we collect and store about you, and how we collect it
- why we collect personal data and what we do with it
- the categories of third parties with whom we share your personal data
- how we retain your information and keep it secure
- how long we keep your personal information
- which countries we transfer your personal information to
- your rights and how to exercise them
- how to contact us.

It also contains information on the correct people to contact in the unlikely event that you have a complaint.

Who are we?

Here are some key details about us:

Our name:

Snacks Développement SAS known as Europe Snacks (but we will refer to ourselves using the word “we” and related words such as “us” and “our” in this privacy policy)

Place of incorporation:

France,

Company number:

Registered number: 798 741 211

Registered address:

ZI Saint Denis les Lucs –

85170 SAINT DENIS LA CHEVASSE

SAS au capital de 63 548 866,39 Euros

VAT number: FR53 798 741 211

There are a number of entities through which we provide our services. Depending on the location where legal or other services are provided, another undertaking or entity in Europe Snacks Group may be the data controller in relation to your personal data.

Where is this site hosted?

Greenshift S.A.S.

9, rue Campagne Première
75014 Paris
France

Capital : 20 000 €
RCS Paris B 524 234 051
SIRET : 52423405100018
TVA : FR 37524234051
NAF : 6311Z

On Behalf of La Cellule S.A.R.L. (hereinafter Big District)

42 rue Monge 75005 Paris
France

Capital 20 000€

RCS Paris 539 714 956
TVA FR25 539 714 956

What information do we collect from you?

In the course of our business – namely the manufacture and sale of crisps, stacked chips, tortillas and snack-based products – we collect the following personal data when you provide it to us:

personal details, such as:

- name and title
- username
- gender
- date of birth
- copy of passport/ID

contact data, such as

- delivery address
- billing address
- e-mail address
- telephone and mobile number(s)

Image data, namely

- CCTV images

biographical data from job applications and CVs, such as

- institutions attended
- academic and other results gained
- employment history
- any other personal information you provide

payment details, such as

- bank account
- card details

transaction data, such as

- details about payments to and from you
- details of products [and services] you have purchased from us

technical data, such as

- 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 our website

profile data, such as

- orders made by you
- feedback and survey responses usage data, such as information about how you use our website, products and services marketing data, such as
- your preferences in receiving marketing and communications.

We do not knowingly collect “special category” personal data. This is a special type of sensitive data to which more stringent processing conditions apply, and comprises data concerning your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, and genetic data and/or biometric data.

We also do not collect information about criminal convictions or offences.

How do we collect personal data?

We obtain personal data from sources as follows:

– directly from you when you interact with us, for example when you

- request information

- buy our products
- write to us
- apply for a job, send a CV or start employment with us

– from others if they provide your details – for example, if a person sends an e-mail to us and copies you on the e-mail, and your e-mail address identifies you by name (please note: if you are providing another person’s details in this way or any others, ensure you have that person’s consent to do so)

– from automated technologies such as cookies and tags when you use our website.

How do we use your personal data?

Introduction

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:

- to perform a contract we are about to enter into or have entered into with you
- if it is necessary for our legitimate interests (or those of a third party) and these are not overridden by your own rights and interests
- where we need to comply with a legal or regulatory obligation.

Lawful processing

In order to process personal data, we must have a lawful basis for doing so. We always ensure that this is the case, and we set out our lawful bases below – but please note that more than one of these may apply at any given time: for example, if we inform you of changes to this privacy policy, we may process your personal data on the ground of complying with our legal obligations and on the ground of legitimate interests.

We will use your personal data only for the purposes for which we collected it, unless we fairly consider that we need it for another reason that is compatible with the original purpose.

Please contact us if you would like more information on this, and on situations in which more than one lawful basis applies.

Contractual Necessity

If you are our customer or applying for a job, we will process your personal data for the following purposes, on the legal basis that it is necessary for us to provide our products and services to you:

- to identify you
- to respond to your inquiries
- to the extent necessary to provide pre-contractual information about our products and services
- to provide our products and services, including enabling them to be delivered to you and contacting you about your order (for example, regarding stock or availability)
- to carry out billing and administration activities, including refunds and credits

- to evaluate any job application that you make and take any next steps, and to evaluate your suitability for roles where you have asked to be considered for future opportunities.

Legitimate Interests

We process your personal information for our legitimate business purposes, which include the following:

- to conduct and manage our business
- to enable us to carry out our services
- to identify suspicious purchasing activity (for example, where a card has been used for high-volume and/or high-value purchases or where cardholder and deliver addresses differ) – however, we do not make automated decisions on the basis of such profiling
- to analyse, improve and update our services for the benefit of our customers
- to deal with complaints
- to let you know about our products, services, promotions or events that we consider may be of interest to you (and which may be tailored to your interests as construed from your purchase history): we carry out this processing on the legal basis that we have a legitimate interest in marketing our products and services, and only to the extent that we are permitted to do so by applicable direct marketing laws. Please see section 8 below for further information about our marketing activities and regarding your right to opt out. Whenever we process your personal data for these purposes, we ensure that your interests, rights and freedoms are carefully considered.

Compliance with laws

We may process your personal data in order to comply with applicable laws (for example, if we are required to co-operate with an investigation pursuant to a court order).

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via e-mail. You have the right to withdraw consent to marketing at any time.

We will always be clear whenever we intend to process on the basis of consent, and we will process lawfully and only for the purpose for which consent was given.

Do we share your personal data?

We may provide your personal data to the following recipients for the purposes set out in this policy:

- other companies in our group
- our service providers, including

- logistics providers, such as those who deliver our orders
 - e-mail and mail service providers
 - technical and support partners, such as the companies who host our website and who provide technical support and back-up services
 - payroll and employee benefits providers
- merger or acquisition partners, to the extent that sharing your personal data is necessary
- law enforcement agencies, government or public agencies or officials, regulators, and any other person or entity that has the appropriate legal authority where we are legally required or permitted to do so, to respond to claims, or to protect our rights, interests, privacy, property or safety
- any other parties, where we have your specific consent to do so.

Do you have to provide personal data – and, if so, why?

To form a contract with you, we will need some or all of the personal data described above so that we can perform that contract or the steps that lead up to it: this is set out above in this notice. If we do not receive the data, the contract could not be performed.

For how long will your personal data be kept?

We carefully consider the personal data that we store, and we will not keep your information in a form that identifies you for longer than is necessary for the purposes set out in this policy or as required by applicable law (i.e. Article 5 of GDPR regulation). In some instances, we are required to hold data for minimum periods. Here below you can find a general global approach on the retention periods per category of data:

Administrative and identification data

Data Category	Data Retention Period
Notarial documents	30 years from completion of formalities
Authentic Act and annexes	75 years
Authentic Act concerning protected minors or adults	100 years
Job Candidate data	1 year

Commercial and Customer data

Data Category	Data Retention Period
Customer data (active commercial relationship)	Duration of the contractual relationship + 5 years
Prospect data	2 to 3 years from last incoming contact

Sensitive data and security

Data Category	Data Retention Period
Data collected for cybersecurity	2 to 10 years depending purpose
Money laundering and terrorist	5 years after the end of the

financing checks	business relationship
Traceability and safety data	13 months for computer traces
Electronic identification data	6 years from last use
Electronic identification data (low level)	1 year from last use

Fraud and litigation data

Data Category	Data Retention Period
Unqualified fraud alerts	Maximum 12 months from issue date
Qualified fraud alerts	5 years from the closure of the file
Fraud list registration	5 years from the date of registration
Data relating to legal proceedings	Until the end of the procedure + limitation period (5 years)

Personal rights data

Data Category	Data Retention Period
Data relating to exercise rights demands	1 year to 6 years depending on the right exercised
Data linked to consent (cookies)	6 months for selection, 25 months for data

Marketing

We may store your contact details, and carry out marketing profiling activities, for direct marketing purposes. If you have given your consent, or if we are otherwise permitted to do so, we may contact you about our products or services that may be of interest to you. You will be given the opportunity to opt out each time you are contacted.

Do we transfer personal data outside the EEA?

Although we are based in France, we may transfer your personal information to a location (for example, to a secure server) outside the European Economic Area, if we consider it necessary or desirable for the purposes set out in this policy.

In such cases, to safeguard your privacy rights, transfers will be made to recipients to which a European Commission “adequacy decision” applies (this is a decision from the European Commission confirming that adequate safeguards are in place in that location for the protection of personal data), or will be carried out under standard contractual clauses that have been approved by the European Commission as providing appropriate safeguards for international personal data transfers.

For more information, please contact us using the details in section 1 of this policy.

How do we keep your personal data secure?

We have security measures in place designed to prevent data loss, to preserve data integrity, and to regulate access to the data. Only our authorised employees and third parties processing data on our behalf have access to your personal data.

All our employees who have access to your personal data are required to adhere to our Privacy Policy and we have in place contractual safeguards with our third-party data processors to ensure that your personal data is processed only as instructed by us.

We take all reasonable steps to keep your data safe and secure and to ensure the data is accessed only by those who have a legitimate interest to do so. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us. Any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Please contact us using the details at the end of this policy if you would like more information about this.

Your information rights

We draw your attention to your following rights under data protection law:

- right to be informed about the collection and use of your personal data
- right of access to your personal data, and the right to request a copy of the information that we hold about you and supplementary details about that information – you will be asked to provide proof of your identity and residential address, and we may ask you to provide further details to assist us in the provision of such information
- right to have inaccurate personal data that we process about you rectified – we want to ensure that the personal information that we process and retain about you is accurate, so please do remember to tell us about any changes, for example if you have moved house or changed your contact details. It is your responsibility to ensure you submit true, accurate, and complete information to us; please also update us in the event this information changes.
- right of erasure – in certain circumstances you have the right to have personal data that we process about you blocked, erased or destroyed
- the right to object to, or restrict:
 - processing of personal data concerning you for direct marketing
 - decisions being taken by automated means which produce legal effects concerning you or that similarly significantly affect you
 - in certain other situations, to our continued processing of your personal data
- the right of portability of your data in certain circumstances.

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 may refuse to comply with your request in these circumstances.

Please contact us using the details at the end of this policy if you would like to exercise any of these rights or know more about them.

These rights are subject to certain limitations that exist in law. Further information about your information rights is available on the CNIL's, the ICO's and the AEPD's websites.

Cookies

For more information on which cookies we use and how we use them, please see our Cookies Policy.

Among the solutions that have been certified as compliant with GDPR regulations by the French local authority named Commission Nationale de l'Informatique et des Libertés (CNIL) during its assessment (you can find a list on the following page <https://www.cnil.fr/fr/cookies-et-autres-traceurs/regles/cookies-solutions-pour-les-outils-de-mesure-dauidience>), Europe Snacks selected Matomo Analytics which as well as minimising the collection of personal data, Matomo automatically takes measures to protect privacy, such as updating users' digital fingerprints daily so that user profiles cannot be built up over time.

You may refuse to have your browsing on this Website tracked. This will protect your privacy, but will also prevent the owner from learning about your actions and creating a better experience for you and other users.

You are not excluded. Uncheck this box to opt out.

Changes to this privacy policy

We may change this policy from time to time. You should check this policy on our website occasionally, in order to ensure you are aware of the most recent version.

What should you do if you have a complaint?

We hope that you will be satisfied with the way in which we approach and use your personal data.

Should you find it necessary, you have a right to raise a concern with the information regulator.

In France: la Commission nationale de l'informatique et des libertés (CNIL): www.cnil.fr

In the UK: the Information Commissioner's Office: <https://ico.org.uk/>.

In Spain: la Agencia Española de Protección de Datos (AEPD): www.aepd.es

However, we do hope that if you have a complaint about the way we handle your personal data, you will contact us in the first instance using the contact details at the end of this policy, so that we have an opportunity to resolve it.

Do you want to contact us?

If you would like to contact us about this notice, including if you wish to receive further information about any aspect of it, our details are as follows:

E-mail

dataprotection@europesnacks.com

Post

For France:

EUROPE SNACKS

ZI St Denis les Lucs – BP 18

85170 SAINT DENIS LA CHEVASSE

For the attention of: Legal Department

Tel. : +33 (0)2 51 41 24 97

For Spain:

Cyl Ibersnacks

Carretera Olmedo Km. 2.2, 47400 Medina Del Campo (Valladolid)

For the attention of Legal Department

Tel: +34 983 812 770

For the UK:

Kolak Snack Foods Ltd & Burts Snacks LTD

308-312 Elveden Road, NW10 7ST, London (United Kingdom).

For the attention of Legal Department

Tel: +44 (0)20 8965 5331