

Group Privacy Policy for Shoppers & Store Credit Accounts

Who is the intended audience for this policy?

This privacy policy is intended for:

- Shoppers that use company-owned stores. For the most part these are owned by *Henderson Retail Ltd* (HRL) and occasionally by *Henderson Wholesale Ltd.* (HWL).
- Shoppers and businesses that have a credit account within a HRL or HWL store.
- Activities performed by *Marketing* (HWL) targeting shoppers that use the *SPAR*, *EUROSPAR*, *ViVO*, *ViVOXtra* and/or *ViVO Essentials* stores in Northern Ireland.

For the purposes of this document *Henderson Retail Ltd* and *Marketing* (HWL) will be referred to as “*the business*” or “*we*.”

Who is *not* the intended audience of this policy?

This privacy policy does not extend to customers or consumers of Barista Bar products. There is a specific Barista Bar policy.

This policy does not extend to the day to day running of *Independently owned stores* that trade under any of the *Henderson Group* brands in Northern Ireland. I.e., *SPAR*, *EUROSPAR*, *ViVO*, *ViVOXtra* and/or *ViVO Essentials*. They are independent businesses that manage their own data. Please contact the specific store manager for advice. Note also independent stores may also run their own promotions.

However, marketing events that relate to the Group brands that run in independent stores may be covered by this policy.

Related Policies

Other Henderson Group activity is contained in separate privacy policies. These include:

- Business to Business – Group Privacy Policy
- Barista Bar Privacy Policy
- Recruitment Privacy Policy
- Employee Privacy Policy

For queries on any of these policies please contact the *GDPR team* on the email address below.

Who we are:

The Henderson Group consists of the following companies:

<i>Company Name</i>	<i>Company Number</i>
Henderson Wholesale Limited (HWL)	NI000068
Henderson Retail Limited (HRL)	R0000035
Henderson Foodservice Limited (HFL)	NI006894
Henderson Group Property Limited (HGP)	NI020650
Henderson Technology Limited (HTL)	NI072364
Henderson Print Limited	NI006447
John Henderson (Holdings) Limited	NI010588

For the purposes of this policy, *Marketing* (HWL) is a function of Henderson Wholesale Ltd.

Contact Details:

Head Office address:

Henderson Group, 9 Hightown Avenue, Mallusk, Newtownabbey BT36 4RT.
Tel: +44(0)28 9034 2733

Address postal queries: *FAO - The GDPR Team (I.S. Dept)*

GDPR Queries : GDPRteam@henderson-group.com
General Queries : info@henderson-group.com

Purpose:

This privacy policy explains how we collect and use your personal data. All personal data will be stored and processed securely in accordance with this policy and the *UK General Data Protection Regulation (GDPR)* and *Data Protection Act 2018*, and any amending and replacement legislation in future.

For the purpose of this policy, the business is the data controller, which means we are responsible for determining when, why and how to process personal data. The business will only collect personal data about you, where it is legal, and/or it is specifically and knowingly provided by you.

How do we collect Personal Data?

The business collects information on you through:

- Our store staff\representatives who have had conversations with you.
- Our Head Office staff e.g. Customer Service, Quality Assurance teams, Complaint handling, Store Credit Accounts team etc.
- Details you have supplied through post, website, or in-person.
- Your use of our websites*.
- Public platforms e.g., Meta, Instagram, X, WhatsApp, YouTube etc.
- Competition entry forms.
- Events attendance.
- Retailers forwarding shopper contact details for marketing purposes.
- Phone and email communications.
- Shopper surveys.
- Store credit account creation.
- The store acquisition process i.e. the purchase of the store, including shopper credit accounts.
- Use of credit account, loyalty\discount card
- Video or image recording by us at various events.
- Images captured through in-store, forecourt and car park CCTV, company delivery vehicle CCTV and body cams where appropriate.
- Third party security organisations providing facial recognition images and confirmation.

*Our websites include:

- henderson-group.com/
- spar-ni.co.uk/
- eurosparni.co.uk/

As part of our dedication to high standards we use cookies and other tracking tools on our websites. Cookies are small packets of data that your web browser stores on your computer when you visit websites, which enable the server to collect information. (See the Cookie policy on each website for further information.)

We also use: app.tellusfirst.com/spar to assist with consumer feedback.

What Personal Data do we collect from you?

As appropriate for the intended use of the information (described below), we may collect your:

- Name, age\date of birth, gender, sex and job title.
- Contact details including postal address, phone\mobile numbers and e-mail address.
- Purchases and orders e.g., via a store credit account.
- On-line browsing activities on our websites and related websites.
- Competition entry details and marketing preferences.
- Interests, preferences, feedback, and marketing survey responses.
- Location data.
- Online identifier.
- Correspondence and communications with us.
- Shopper\business details to set up and run a store credit account.
- Credit reference details to set up a store credit account.
- Loyalty account information based on use of card e.g., MyRewards card etc.
- Publicly available personal data, (including any which you have shared via a public platform).
- Information through the store acquisition process e.g., store credit accounts
- CCTV images as part of store security
- Image via third party facial recognition security provider.

Children's Personal Data:

The age of consent in the UK for data processing is 13 years old as stipulated by the Data Protection Act 2018. Occasionally children's personal data is collected.

Typically, this data is used for:

- Entering competitions – e.g., colouring competition to win a prize.
- Photographs - e.g. To promote events such as the Balmoral Show.

We gain written *parental consent* before collecting the personal data of children. The personal data might include the image, name, age and school of the child.

We do not actively solicit or knowingly collect personal data from children without proper parental consent.

Personal Data we do not collect:

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, genetic and/or biometric data. Neither do we collect any information about criminal convictions and offences. The exception to this is when we capture images of people through for example CCTV and those images incidentally reveal a person's race, ethnic origin, or disability.

Legal Basis for Processing your Personal Data:

We will only use your personal data when permitted by law. Most commonly, we will use your personal data where:

- We need to perform the contract; we are about to enter into or have entered into with you.
- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- We need to comply with a legal or regulatory obligation.
- We might need to protect your vital interests in the event of an emergency.

How we use your Personal Data:

Examples of the way in which we may use your information is set out below:

- To communicate requested information concerning goods and services.
- Track queries and communicate progress,
- Enter competitions that we run and administer.
- Deliver relevant content of websites and advertisements and measure the effectiveness of that content.
- Research the customer experience and understand sales hotspots by using anonymised personal data.
- Use data analytics to enhance our websites, products/services, marketing, customer relationships and experiences.
- To improve programmes\services e.g. Loyalty cards.
- Run promotional campaigns and deliver relevant marketing information.
- Retailers forwarding shopper contact details to enable the distribution of electronic magazines\emails, for marketing purposes.
- Credit reference details are used to determine financial reliability and risk when setting up and using a store credit account.
- To continue to provide a store credit account facility in the case of a store acquisition.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.
- Verify identification.
- Notify you of changes to products\services.
- Comply with our legal obligations and responsibilities and to defend legal claims.
- For crime and fraud prevention, detection, and related purposes.
- For good governance, accounting and managing our business operations.
- To support any other intended purpose stated at the time in which your information is collected, subject to any preferences which you may have indicated.

Image Repository

Personal data in the form of CCTV recorded images is used to prevent and detect crime. Images of shoppers leaving the store without paying for goods or driving away without paying for fuel are submitted to a secure database. HRL stores can securely access the same database with the objective to watch for repeat behaviour.

Data Retention

The business retains general CCTV shopper images for approximately 30 days and then records over. The database of shopper images that fail to pay for goods is retained for up to 9 months before being automatically deleted.

We retain other personal data for as long as required for the purposes for which we need it. After which it is securely deleted, destroyed, or anonymised. Exceptions to this include if there is:

- an unresolved issue, such as a claim or dispute.
- a legal requirement to retain the data or
- an overriding legitimate business interests, e.g., fraud prevention and protecting customers' safety and security.

How we protect your Personal Data

We take all necessary and reasonable steps to ensure that your data is managed securely and in accordance with this privacy policy. All information you provide to us is stored on secure servers or within secure filing systems and we use strict procedures and security features to prevent unauthorised access.

To whom will we provide your Personal Data?

From time to time, we may need to disclose your information to:

- Market research companies to carry out market research about the HWL or HFL brands.
- Suppliers, where appropriate. E.g. Customer complaint letters. Normally permission will be asked of the customer, either verbally or by email, if they are happy for their details to be shared with a supplier.
- Professional advisors (including lawyers, solicitors, bankers, accountants, insurers, and insurance brokers) in the event of a breach of contract, dispute, or other legal proceedings.
- Third party data processing service providers such as marketing automation platform and service providers, IT hosting providers, data security providers and FMCG suppliers to HWL, who process your information on our behalf in accordance with our instructions to enable us to provide services to you.
- The emergency services i.e. police, fire, medical, etc, if it is appropriate and necessary. E.g. A shopper collapses in a store and a medical practitioner would like to examine the CCTV recording to understand if the shopper hit their head as they fell.
- Other-organisations for the purposes of crime prevention and/or detection, including identifying individuals e.g. A CCTV recording might be shared which identifies a supplier's delivery driver frequently taking a coffee without paying for it.
- Organisations to recover debt. E.g. In HRL stores where a customer has no means of payment or has driven off without paying for fuel.

Transfers to Third Countries and International Organisations

A third country is a country other than the EU member states (and additional EFTA countries) that have implemented GDPR as law.

We transfer personal data to third countries or international organisations to help deliver our products and services. We are satisfied that the personal data is appropriately secured and protected by the receiving organisations.

Your rights over your Personal Data

GDPR provides data protection rights in relation to your personal data. You have the right to:

- Be informed about the collection and use of your personal data.
- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Withdraw consent.
- Be protected against solely automated decision making and profiling.

Note that some of these rights are not absolute and only apply in certain circumstances.

Where the business relies on *consent* as a legal basis for processing your personal data, you have the right to withdraw that consent at any time. Each marketing email we send you will offer an option to *unsubscribe*.

If you would like to exercise any of these rights, please contact us.

GDPRteam@henderson-group.com

FAO – GDPR Team (I.S. Dept),
Henderson Group, 9 Hightown Avenue, Mallusk, Newtownabbey BT36 4RT.

Tel: +44(0)28 9034 2733

Your right to lodge a Complaint:

If you are not happy with how your personal data has been handled, you have the right to lodge a complaint with a supervisory authority. The UK supervisory authority for data protection issues is the *Information Commissioner's Office* (ICO) www.ico.org.uk. We would, however, appreciate the chance to redress your concerns before you approach the ICO.

What if there are changes to this Privacy Policy?

Occasionally, to better protect you and in accordance with the law, we may need to update our privacy policy. Those changes will be made here. We reserve the right to amend, update or replace this privacy policy at any time.