

Group Privacy Policy for Business to Business

Who is the intended audience for this policy?

This privacy policy is intended for:

- Retailers and potential retailers that trade or intend to trade under one of the *Henderson Group* brands in Northern Ireland. I.e., *SPAR*, *EUROSPAR*, *ViVO*, *ViVOXtra* and/or *ViVO Essentials*.
- Customers of *Henderson Foodservice Limited*, *Henderson Technology Limited* and *Henderson Print Limited*.
- Suppliers to *Henderson Wholesale Limited*, *Henderson Retail Limited*, *Henderson Foodservice Limited*, *Henderson Group Property Limited*, *Henderson Technology Limited* and *Henderson Print Limited*.
- Clients and tenants of *Henderson Group Property Limited*.
- Trainees of *The Academy*.
- Attendees of Henderson company organised conferences.
- Visitors to the Mallusk depot.

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

This policy is not intended to supply information to:

- Shoppers of any store that trades under any of the *Henderson Group* brands in Northern Ireland. I.e., *SPAR*, *EUROSPAR*, *ViVO*, *ViVOXtra* and/or *ViVO Essentials*.
- Shoppers and businesses that have a credit account within a HRL or HWL store.
- Cover any activities marketed by Henderson Wholesale at the above stores.
- Barista Bar loyalty customers.

Related policies

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

- Shoppers & Store Credit Accounts – Group Privacy Policy
- Barista Bar Privacy Policy
- Recruitment Privacy Policy
- Employee Privacy Policy
- Cookie policies (relevant to website)

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

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 document the companies above will be referred to as “*the business*” or “*we*.”

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 held and stored 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, we are the data controller, which means we are responsible for determining when, why and how to process personal data. We 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?

We collect information on you through:

- Our contract with you.
- Our representatives who have had conversations with you.
- Details you have supplied through post, your website or in-person.
- Your use of our websites*.
- Public platforms e.g., Meta, Instagram, X, YouTube etc.
- Trade shows or events.
- Recorded webinars or online workshops, e.g. HORIS Retailer Webinars
- Phone and email communications. E.g., Some phone calls are recorded for training and monitoring purposes. (Both parties will be notified of recordings.)
- Images captured through Mallusk depot CCTV, company delivery vehicle CCTV and body cams where appropriate.
- TUPE information supplied through acquisitions and potential acquisitions in the case of a business transfer. (Reference - Transfer of Undertakings (Protection of Employment) Regulations 2006.)
- HMRC (NI) & The Revenue Commission (ROI) if HWL payroll service is engaged.
- Third parties who have your consent to pass your details to us. E.g., Your business manager or event management companies working on our behalf.
- Regular business with you.

*Our websites include:

- henderson.technology/
- hendersonprint.com/
- henderson-foodservice.com/
- horis.henderson-group.com/
- henderson-theacademy.com/
- henderson-group.com/

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 Cookie policy on each website for further information.)

What Personal Data do we collect from you?

As appropriate for the intended use of the information described below, we collect or may collect certain personal data including your:

- Name, date of birth (if required), address, phone\mobile and email address. This data may be required for the following examples - the business owner\director details, business referee, contact person, buying representative, client, tenant, site visitor, trainee, conference delegate, etc.
- Purchases, orders, customer loyalty information.
- On-line browsing activities on our websites and related websites.
- Login details including passwords for websites e.g. horis.henderson-group.com/ or henderson-foodservice.com/.
- Interests, preferences, feedback, and survey responses.
- Location data.
- Correspondence and communications with us.
- Publicly available personal data, including any which you have shared via a public platform.
- Image, name, store name\location, verbal and written comments, within the context of recorded workshops, e.g. The HORIS Retailer Webinars.
- CCTV images.
- Retail system IP address and remote connection data to enable technical support.
- Photographs for marketing purposes e.g. A retailer may feature with his spouse.
- Family details for *succession planning*. I.e., Details of partner\spouse and children.
- Delegate data for conferences which includes passport details to organise trips outside NI. E.g., retailer or catering conferences.
- Business bank account details (for the purpose of collecting payment by direct debits.)
- Credit ranking.
- Qualification prerequisites for trainees attending courses.
- Retailer employee data in the form of a cashier ID which is collected as part of sales transaction data for each store.
- Details during an acquisition e.g. A store acquisition as part of TUPE. I.e., A list of the employee's national insurance number, date of birth and bank account details.

If the business uses the (HWL) payroll service, we may also collect:

- Contact details of your staff.
- Bank account details of your staff.
- Hours worked.
- Details of the terms and conditions of your staff employment, including remuneration and entitlements to benefits.
- *National Insurance Number (NI) / Personal Public Service Number (ROI)* of staff and other PAYE details.
- Information about staff nationality and entitlement to work in either Ireland or the UK.
- Changes to personal details of staff during employment.
- Reasons for absences which may include health details.

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:

- Photographs - e.g. To promote events e.g. A family retail store has been newly opened.
- Succession Management – to assist the planning of family run businesses.

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.

Special Categories of Personal Data:

We do not collect any of the following *Special Categories of Personal Data*. Information about your religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and/or biometric data. Neither do we collect any information about criminal convictions and offences.

However, if you use the (HWL) Payroll service for your staff the business will require details on staff nationality and entitlement to work in either Ireland or the UK, which will include details on race and ethnicity. They may also access sick notes to do with absence from work which may include details about a person's health.

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 Information:

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

- Perform the contract we are about to enter into or have entered into with you.
- Process and fulfil orders placed with us by you.
- Have orders fulfilled by you for us.
- Pay or receive payment for those orders.
- Administrate and enable an ongoing contract with you.
- Confirm identification.
- Notify you of changes to products\service.
- Run promotional campaigns and deliver relevant marketing information.
- Request or receive sales promotional material.
- Manage queries/concerns regarding our products or services;
- Keep our records updated and study how our services are used.
- Deliver relevant content of websites and advertisements and measure the effectiveness of that content.
- Use data analytics to enhance our websites, products/services, marketing, customer relationships and to understand the effectiveness of the business processes we run.
- Run and grow our business, develop our services, and administer ancillary services such as IT provision and network security.
- Installation and training of equipment e.g. EDGEPoS tills.
- Provide technical support for retail systems.
- Use images for marketing e.g. A retailer opening a store with his family.
- Maintain our database of retail store locations.
- Provide retailer guidance through recorded workshops\webinars e.g. HORIS
- Organise work-based conferences or business trips.
- To pay employees of retailers as part of the (HWL) Payroll service.
- Plan succession ownership for retail stores.
- List employee details as part of a store acquisition (TUPE.)
- Comply with our legal obligations and responsibilities and to defend legal claims.
- For good governance, accounting and managing our business operations.
- To support Spar Benevolent Fund claims
- Offer a training service e.g. to retailer employees.
- Acquire stores.
- Provide surveys, plans and elevations for store designs\enhancements.
- Review retailers' succession planning or ability to expand the business.

Data Retention

We retain retailer and HFL customer personal data while you remain a customer of the business and for 7 years thereafter.

We retain other personal data e.g., supplier, tenant, client, or trainee data for as long as required for the purposes for which we need it. After which it is securely deleted, destroyed, or anonymised. We retain CCTV images for approximately 30 days and then record over. We retain recorded webinars for as long as they are useful to the retailers, after which they are deleted.

Personal data may be retained for extended periods if there is:

- an unresolved issue, such as a claim or dispute
- a legal requirement to store the data for a longer period or
- an overriding legitimate business interests, including but not limited to 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 our secure servers or within secure filing systems and we use strict procedures and security features to prevent unauthorised access.

To whom will we share your Personal Data?

We disclose your information to:

- Other companies within our group and their employees to provide a wide-ranging service, based within NI.
- SPAR UK and Retail N.I., based within the UK.
- Market research companies to carry out market research, based within the UK.
- Marketing sub-contractors for leaflet distribution or photographs of events, based within the UK.
- Suppliers who wish to measure their own brand sales regionally, based within the UK.
- Loyalty/rewards programme promoters, based in the US, that adhere to GDPR guidelines.
- Loyalty/rewards programme promoters, based in the UK.
- Event management organizations and digital agencies e.g. For organizing business conferences.
- External training organisations based in the UK and accredited examination bodies (e.g. For emergency first aid, Food safety etc).
- External pension providers where appropriate, based in the UK.
- Central billing suppliers to make deliveries to retailers based in NI.
- Third party transport organisations to make deliveries, based in UK.
- Professional advisors where applicable (including lawyers, bankers, accountants, insurers, and insurance brokers), based in the UK.

- I.T. network and hosting providers.
- Data security providers.
- Payment solution providers based in the U.S and UK.

- Select suppliers and/or couriers to facilitate delivery of stock, point-of-sale and display stands, within the UK.
- Organisations or sub-contractors based in the UK involved in store maintenance or development e.g., supplying and installing coffee machines, fixtures and fittings, fridges, freezers, ovens, wallboards, alarms and other equipment and generally fulfilling service contracts.

- External contractors for projects, signage installation, surveys or repairs if an accident has occurred at a store.
- HMRC for the Payroll service. HMRC has an obligation to other government bodies for the purposes of earnings information, such as DEAs, AOE's, Pension regulators and providers. Also, part of the payroll service and if requested, personal data may be sent to the local benefits office of employees or their solicitors.

- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- Third parties in connection with, or during negotiations of, any merger, consolidation, restructuring, financing, or sale of company assets.

- Other retailers in the form of recorded workshops/webinars designed to assist all retailers or in the context of litigation (if authorised).
- Insurance companies (in the event of an accident at the store).

- The emergency services i.e., police, fire, medical, etc, if it is appropriate and necessary. E.g. A visitor collapses at head office and a medical practitioner would like to examine the CCTV recording to understand if the visitor hit their head as they fell.
- Other partnering organisations for the purposes of security, crime prevention or detection.

These organisations process your information in order for us to provide services to you and to facilitate the purposes described previously. We will only ever do so as permitted by and in accordance with applicable data protection law.

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 we rely on *consent* as a legal basis for processing your personal data, you have the right to withdraw that consent at any time.

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.