Privacy Policy

At SH Pratt Group, we are committed to protecting and respecting your privacy.

We believe:

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data should only be collected and processed when absolutely necessary
- It is wrong to sell, rent or otherwise distribute or make public your personal information, and so will not do so.

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- <u>EU General Data Protection Regulation 2018 (GDPR)</u>

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to info@shpratt.com or by writing to SH Pratt Group, Laporte Way, Luton, Bedfordshire. LU4 8EN.

1. Who are we?

We are SH Pratt Group (registered company number **00637730)**, an independent family business specialising in fruit ripening and distribution, with a reputation for excellence since 1960. The registered address is Laporte Way, Luton, Bedfordshire. LU4 8EN.

The SH Pratt Group comprises of subsidiaries **SH Pratt Bananas**, **Kinship Logistics**, **Kinetic Driver Recruitment and Training and Halo Value Added Services**.

2. How do we collect information from you?

We obtain information about you when you use our website, for example, when you contact us about our services, or if you register to one of our newsletters.

Like most websites, we use Google Analytics to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this.

2.1 Contact forms and email links

Should you choose to contact us using the contact form on our Contact Us page or an email link from our website, none of the data that you supply will be stored by this website or passed to any of the third party data processors defined in <u>section 6.0</u>. Instead the data will be collated into an email and sent to us directly by email. Our SMTP servers are protected by SSL.

2.2 Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to <u>MailChimp</u> who provide us with email marketing services. We consider MailChimp to be a third party data processor.

The email address that you submit may also be stored in our internal computer systems. Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by emailing us at info@shprattgroup.com .

While your email address remains within the MailChimp database, you will receive periodic newsletter-style emails from us.

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with GDPR legislation.

- Google (Privacy policy)
- Mailchimp (Privacy policy)

3. What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, telephone number and information regarding what pages are accessed and when.

4. How is your information used?

We may use your information to:

- process orders that you have made;
- call or email you about our services;
- to carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about our associated companies goods and services;
- process a job application.

We review the personal data we hold on a regular basis.

5. Who can access your information?

We will not give, sell or rent your information to third parties for their use.

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to complete our marketing, accounts and sales activities). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. We will not release your information to third parties beyond the SH Pratt Group of companies third party networks for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

6. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary.

7. Your choice

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about our products and services, then you can select your choices by ticking the relevant boxes situated on the contact form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can

change your marketing preferences at any time by contacting us by email info@shpratt.com.

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: info@shprattgroup.com, or write to us at: SH Pratt Group, is Laporte Way, Luton, Bedfordshire. LU4 8EN.

You have the right to ask for a copy of the information SH Pratt Group hold about you.

8. Security to protect your information

When you give us personal information, we take steps to ensure that it's treated securely. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

9. Use of 'cookies'

Like many other websites, the SH Pratt Group and associated companies' websites use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies of may result in a loss of functionality when using our website. See our cookie policy.

10. Links to other websites

Our website may contain links to other websites, predominantly those belonging to SH Pratt Group. This privacy policy only covers our group of companies, namely SH Pratt Bananas, Kinship Logistics, Kinetic Driver Recruitment and Halo Value Added Services. For those websites not part of the SH Pratt Group, we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

11. Under 16?

We protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

12. Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

13. Changes to our Privacy Policy

We keep this Policy under regular review. This Policy was last updated in April 2018. We will not explicitly inform our clients or website users of these changes. Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

14. Data Protection Officer

If you have any questions about our privacy policy please contact Shahida Mohamed – shahidamohamed@shprattgroup.com

15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact info@shpratt.com. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.