

Privacy Notice

Responsibility: The Data Protection Officer holds primary responsibility for this policy. If there are any questions or concerns related to this policy, please contact the Data Protection Officer using the contact information set out in Section 2 of this policy.

1 Introduction:

This Privacy Notice describes the ways in which **Newly Weds Foods** processes and protects the Personal Data of our customers (prospective, current and past), our event attendees, job applicants and other business contacts or visitors to our website in accordance with **Applicable Data Protection Laws**.

This Privacy Notice applies to the processing of **Personal Data** by Newly Weds Foods within the **UK**, Europe and **PRC**, in relation to the provision of our products and services, including any Personal Data you provide in the provision of products and services by us to actual and prospective customers, and the use of our websites listed in Annex 2 - List of Websites, including when you sign up to receive newsletters, blog posts, events, contact forms or apply to vacant positions via our **Career Database**.

2 Controller:

The Controller under this Privacy Notice is Newly Weds Foods.

Please see **ANNEX 1 – List of Entities** for a current list of all our legal entities within our UK, EU and PRC offices and their contact information.

If you have any questions about this Privacy Notice, please contact us using the contact details set out below:

Email privacy@newlywedsfoods.com
Post FAO: Timothy Whelan, Data Protection Officer
 Newly Weds Foods Limited
 Owl Lane
 Ossett
 West Yorkshire
 WF5 9AX

3 Does this Privacy Notice apply to me?

If you are a **Customer, Supplier, User, or Applicant** we process your Personal Data, then this Privacy Notice will apply to you. References in this Privacy Notice to “you” or “your” are references to those individuals.

4 **The data we collect about you:**

For the purposes of this Privacy Notice, Personal Data means any information about you and excludes anonymous or de-identified data that cannot be associated with you. We may collect and process certain types of Special Categories of Personal Data when we have a legitimate need to do.

We collect, use, store and transfer different kinds of Personal Data about you, which we have grouped as follows (these terms are used throughout this Privacy Notice):

“Business Information” including information provided in the course of the contractual or client relationship between you or your organisation and us, or otherwise voluntarily provided by you or your organisation, including company annual revenues, number of employees, or industry.

“Contact and Identity Data” includes your job title and function, email address, delivery address, billing address, billing name, employee number/ID, telephone number, first name, middle names, maiden name, last name, marital status, title, date of birth and other Personal Data concerning your preferences, emergency contact and next of kin.

“CCTV and Physical Security Data” includes CCTV footage and other information relating to access of our facilities obtained through electronic means.

“Financial Data” bank account details, credit card number, and credit card number.

“Marketing and Communications Data” includes your preferences in receiving marketing from us and our third parties and your communication preferences.

“Recruitment Data” includes your previous positions, information within your CV, cover letter, professional experience, references, language skills application, and educational history.

“Health Data” information about your health, including any medical condition, health and sickness records.

“Equal Opportunity Data” sex/gender, race, nationality, ethnicity, religion, health and sexual orientation.

“Technical & Log Data” includes information on your internet protocol (IP) address, unique device identifiers, cookie ID, your login data, browser type and version, wireless networks, mobile phone towers near your mobile, time zone setting and location, browser language, browser plug-in types and versions, operating system and

platform and other technology on the devices you use to access this website. Please see our Cookie Notice for further details.

5 If you fail to provide Personal Data to us:

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 the Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the Personal Data is collected.

6 How your Personal Data is collected:

We use different methods to collect Personal Data from and about you, including through the channels set out below.

Direct Interactions You give us your Business Information, Contact and Identity Data, Financial Data, Recruitment Data, Health Data, and Equal Opportunity Data Identity for example, filling in forms or by corresponding with us by post, phone, email or otherwise.

Automatic technologies or interactions. We may automatically collect Technical & Log Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. Please see our Cookie Notice for further details.

Third parties or public available sources. We receive some Business Information, Recruitment Data, Equal Opportunity Data, Technical & Log Data about you from third parties such as recruitment agencies and other publicly available sources.

7 How we use your Personal Data:

We will only use your Personal Data when the Applicable Data Protection Laws allow us to, this includes but is not limited to:

- where we need to “**perform a contract**” that we are about to enter into or have entered into with you;
- where need to comply with a “**legal or regulatory obligation**” that we are subject to;
- where it is necessary for “**legitimate interests**” pursued by us or a third party;
- where it is necessary for the establishment, exercise or defence of “**legal claims**”; and
- where you have provided us your explicit “**consent**”.

7.1 Purposes for which we will use your Personal Data:

We use your Personal Data only for the following purposes:

Purpose	Categories of Personal Data	Lawful Basis (GDPR/UK GDPR)	Source
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, and to be able to share aggregate statistics such as the frequency of a particular link being clicked on.	Technical and Log Data	Legitimate interest: reviewing how customers use and what they think of our websites, improving our websites and identifying ways to grow our business.	Direct Interactions Automatic technologies or interactions.
To administer and manage our relationship with you, including accounting, auditing, and taking other steps linked to the performance of our business relationship including identifying persons authorised to represent our customers, suppliers or service providers	Business Information Contact and Identity Data	Legitimate interests	Direct Interactions Third parties or public available sources.
To check financial qualifications, manage payments, fees and charges and to collect and recover money owed to us.	Business Information Contact and Identity Data Financial Data	Legitimate Interest	Direct Interactions
To manage our relationship with you which will include notifying you about changes to our terms of business or this notice.	Identify Data Contact Data	Legitimate Interest	Direct Interactions
<p>Recruiting activities, including</p> <ul style="list-style-type: none"> • to make decisions about your recruitment and appointment; • to check that you are legally entitled to work in the UK; • to undertake any criminal records (DBS) checks; • to assess your 	Contact and Identity Data Recruitment Data Health Data Equal Opportunity Data	Legitimate Interest Legal obligation (reasonable adjustments and equal opportunities in compliance with the Equality Act 2010) Legal claims	Direct Interactions Third parties or public available sources.

<p>qualifications for a particular job or task;</p> <ul style="list-style-type: none"> to consider and make any appropriate adjustments to our recruitment processes as a result of any disability you may have; to deal with any legal disputes; to carry out equal opportunities monitoring; and where your application is successful, to carry out our obligations arising from any contracts entered into with you and to administer your ongoing relationship with us. 			
To take you on as a new supplier.	Business Information Contact and Identity Data	Legitimate Interest	Direct Interactions
To manage and protect our business, including improving data security, fraud, system maintenance, violation of Newly Weds' applicable agreements, and testing, data storage.	Business Information Technical & Log Data	Legitimate Interests	Direct Interactions Automatic technologies or interactions.
Use data information to optimise the information displayed on our website on and, overall, to improve the user experience when using the Services.	Technical & Log Data	Legitimate Interests	Direct Interactions Automatic technologies or interactions.
We may use information about your location to customize our services with location-based information, advertising, features, or to determine regulatory applicability.	Technical & Log Data	Legitimate Interests	Direct Interactions Automatic technologies or interactions.

To invite you to take part in marketing or other events, to contact you to further discuss your interest in our services and to send you information regarding Newly Weds Foods, its affiliates, and its partners.	Contact and Identity Data Marketing and Communications	Legitimate interests	Direct Interactions Third parties or public available sources.
To connect with your social media account. If you authorise such a connection, you permit us to share or publish information about your activity on our website with authorised social network and its users.	Technical & Log Data	Consent	Direct Interactions Automatic technologies or interactions.
To plan and operate events, create and offer professional education, host online forums and in person networks in which event attendees may participate, and populate online profiles.	Contact and Identity Data Marketing and Communications	Legitimate interests	Direct Interactions Third parties or public available sources.
Detection and prevention of crime; safety incidents; unauthorised access to our premises and restricted areas; gross misconduct; supporting safety, security and internal investigations; supporting criminal investigations; and for reviewing security & safety incidents.	CCTV and Physical Security Data	Legitimate interests Legal Obligation Legal Claims	Direct Interactions

8 Marketing:

Opt-Out:

We will not use your Personal Data to send you marketing materials if you have requested not to receive them. If you request that we stop processing your Personal Data for marketing purposes, we shall stop processing your Personal Data for those purposes.

You are able to opt-out from marketing communications sent via e-mail at any time, free of charge by using the “unsubscribe” or by sending an email to privacy@newlywedsfoods.com.

Other Third-Party Marketing, Links and Social Media:

Newly Weds Foods services may contain links to third-party websites, and we may also partner with other companies to jointly offer products or services.

If you purchase or specifically express interest in a jointly offered product or service from Newly Weds Foods, we may share your Personal Data collected in connection with your purchase or expression of interest with our joint promotion partner(s).

We will not share Personal Data about event attendees with business partners unless you specifically opt in to such sharing via an event registration form or you attend a Newly Weds Foods event and have your attendee badge scanned by a business partner.

Please note, any information you provide via third parties will be in accordance with their own privacy policies.

9 Cookies:

You can set your browser to refuse all or some browser cookies, or to alert you when website set or access cookies.

If you disable or refuse cookies, some parts of our website may become inaccessible or not function properly. Please see our Cookie Policy for more information about the cookies we use.

10 Data sharing to third parties:

We may share your Personal Data for the purposes set out above with our US, EEA and global offices as well as with trusted third-party vendors and business partners. These are set out below:

10.1 Transfers/Sharing to Unaffiliated Third Parties:

- a. Your Personal Data will be shared internally within the Company and other companies in our group and who may be based outside the UK, EEA and PRC as reasonably necessary for the purposes set out above (see Section 11 below for further information).
- b. Our professional advisers or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us.
- c. Service providers with which Newly Weds Foods has contracted to provide services on our behalf, such as billing, sales, hosting the website, conducting marketing activities, surveys and research, participation in a contest or sweepstakes, processing transactions, fulfilment, data storage, transfer, analysing our sites and performing analyses to improve the quality of our business, sites, products and services.
- d. Enforcement including any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body.
- e. Acquisitions or divestitures. We may share your Personal Data with persons or entities outside Newly Weds Foods 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 Notice.

We require all third parties to respect and protect the security and confidentiality of your Personal Data and to treat it in accordance with the law. We do not allow third parties 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.

11 **International Data Transfers:**

Newly Weds Foods is a global business and we may need to transfer your Personal Data to other group companies and affiliates as part of our legitimate business operations. We transfer Personal Data intra-group and externally to third countries outside the UK and EEA ensuring that where the country concerned does not benefit from an **Adequacy Decision** from the UK government or European Commission that appropriate safeguards are put in place in accordance with applicable data protection laws.

Please contact us using the contact details set out in Section 2 above, if you would like further information about the specific mechanism used by us when transferring your Personal Data out of the UK and/or the EEA.

- a. **Intra-group transfer:** from our UK and EEA Offices to our offices in the United States, India, and Thailand: we use intra-group data transfer agreements incorporating EU Commission-approved Standard Contractual Clauses (2021/914) and the UK International Data Transfer Addendum, as applicable.
- b. **Transfers to Unaffiliated Third Parties:** we use data transfer agreements based on the applicable EU Commission-approved Standard Contractual Clauses or UK International Data Transfer Addendum, as applicable.

Where it is necessary to transfer data to third countries outside the UK and EEA in addition to applying appropriate legal safeguards we have conducted transfer risk assessments in line with the **Schrems II** decision and considered whether supplemental measures are required to ensure your Personal Data receives adequate protections to standard that is essentially equivalent to that required under Applicable Data Protection Laws. Please contact us should you require further information regarding these assessments. In exceptional cases, we may rely on statutory derogations for international data transfers permitted under applicable data protection laws.

12 **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 and are subject to a duty of confidentiality. For further information concerning our data security practices please contact us using the contact details set out in Section 2 above.

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.

13 Data Retention:

We will only retain your Personal Data for as long as necessary for the purposes for which the data was collected, except where necessary to meet our legal obligations or in order to establish, exercise or defend potential legal claims or to pursue our legitimate interests.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by contacting contact us using the contact details set out in Section 2 above.

14 Your Legal Rights:

Under certain circumstances, you have rights under applicable data protection laws in relation to your Personal Data. These include the rights to:

- Access** Obtain confirmation of whether we are processing your Personal Data and information on how your Personal Data is being used by us. This includes the right to receive a copy of that Personal Data we hold on you.
- Rectification** Have any inaccurate or incomplete Personal Data rectified only to the extent this is not in breach of a legal obligation.
- Portability** Receive Personal Data that you have provided to us and transmit such Personal Data to another controller, for example, where the processing of such Personal Data is based on consent or on a contract and is processed by automated means.
- Erasure** Request that certain Personal Data held by us is erased but only to the extent this is not in breach of a legal obligation.
- Restrict** Suspend or block the processing of your Personal Data only to the extent this is not in breach of a legal obligation.
- Object** Object to processing, for example, where we process that Personal Data (a) based on legitimate interest or (b) for direct marketing purposes.
- Consent** Decline to consent or withdraw consent.

These rights are not absolute and are subject to various conditions under Applicable Data Protection Laws to which we are subject.

In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 7.1 of this Privacy Notice.

If you wish to assert any of these rights, please contact us using the contact details set out in Section 2 above.

15 Additional information if you are located in the PRC

This section applies to you if you are located in the PRC. In the event of any inconsistency between the provisions of this section and other sections, this section shall prevail.

We will only use your Personal Data when one or more of the following lawful bases applies:

- a. where you have provided us your explicit “**consent**”.
- b. where we need to “**perform a contract**” that have entered or will soon enter into with you;
- c. where we need to comply with a “**legal or regulatory obligation**” that we are subject to;
- d. where it is necessary for us to respond to sudden public health incidents or protect individuals’ “**vital interests**” under emergency conditions;
- e. where it is necessary for us to establish, exercise or defend against “**legal claims**”; or
- f. where we process “**lawfully disclosed Personal Data**” within a reasonable scope.

To the extent permitted by PIPL, we may transfer your Personal Data intra-group and externally to third countries outside the PRC and ensure that appropriate safeguards are put in place unless exempted.

16 How to make a complaint about the use of your Personal Data by us?

You may also raise your concerns with your local data protection authority directly. We would, however, encourage you to contact us in the first instance as we aim to promptly, efficiently and satisfactorily resolve any concerns or complaints you may have in relation to our processing of your Personal Data.

If you are located in the EEA or the UK, you can find the contact detail of your national Data Protection Authority, details of which can be found [here](#), and for the UK it is the Information Commissioner’s Office [here](#).

17 Changes to this Privacy Notice:

We reserve the right to update this Privacy Notice at any time. If we make a change to this Privacy Notice that, in our sole discretion, is material, we will update this Privacy Notice.

Annex 1 – List of Entities

Newly Weds Foods Limited	Ossett Owl Lane Ossett West Yorkshire WF5 9AX ENGLAND	+44 (0)1924 280444
	Banbury Lombard Way Banbury Oxfordshire OX16 4TJ ENGLAND	
	Corby 86-87 Manton Road Earlstrees Industrial Estate Corby Northamptonshire NN17 4JL ENGLAND	
Newly Weds Foods Acquisitions Limited	Owl Lane Ossett West Yorkshire WF5 9AX ENGLAND	
Jigsaw Foods Limited	Redbridge Close Shirebrook, England NG20 8RU England	
Witwood Food Products Limited	Owl Lane Ossett West Yorkshire WF5 9AX ENGLAND	
Arthur Pipkins Limited	Owl Lane Ossett West Yorkshire WF5 9AX ENGLAND	
Newly Weds Foods France	Owl Lane Ossett West Yorkshire WF5 9AX ENGLAND	

Newly Weds Foods Poland SP Z.O.O	Ul. Grabarska 1 Wroclaw Dolnoslaskie 50-079	
Newly Weds Foods (Beijing) Co., Ltd.	No. 11 North Yanqi 2nd Street Yanqi Economic Development Zone Huairou District Beijing China	010 - 61666868
Newly Weds Foods (Nantong) Co., Ltd.	No.33, Guangxian road Nantong Economic & Technological Development Zone Nantong City Jiangsu China	0513 - 80106868

ANNEX 2 - LIST OF WEBSITES

<https://newlywedsfoods.co.uk/>

<https://www.newlywedsfoods.cn/>

ANNEX 3 - LIST OF ALL CONTACTS

NWF UK and EU:

General information: enquiries@newlywedsfoods.co.uk

Sales & marketing: sam@newlywedsfoods.co.uk

NWF China:

General information: administratorbeijing@newlywedsfoods.com

Sales & marketing: salesbeijing@newlywedsfoods.com

ANNEX 4 Definitions:

- “Applicant”** means all individuals that supply their Personal Data (whether by such individual or by a third party, such as a recruitment agency) for a position with us for a job (whether via our Career Database, directly to our recruitment email address or on a speculative basis).
- “Applicable Data Protection Laws”** means the EU GDPR, the UK GDPR, the UK Data Protection Act 2018, the PIPL and any national laws governing the protection of Personal Data as may be amended from time to time.
- “Career Database”** means our careers page where we list all vacant positions.
- “Customers”** means an individual or legal entity (actual or prospective) in relation to products and/or services pursuant to our Terms and Conditions, or that makes or made contact with or has or had discussions with us with a view to establish a contract (whether or not such a contract was or is subsequently established). This includes Customer’s individual employees, customers or suppliers or individuals otherwise associated with Customers.
- “Controller”** means an individual or entity who or which, alone or jointly, determines the purposes and means of processing of Personal Data (and, where relevant, this term shall have the specific meaning attributable to it (or an equivalent term) for the purposes of the Applicable Data Protection Law, without limiting the foregoing, the term “Controller” includes a “personal information handler” under the PIPL).
- “EEA”** means all the EU countries and also Iceland, Liechtenstein and Norway.
- “EU”** means the European Union or, where relevant in the given context, the European Economic Area.
- “EU GDPR”** means the General Data Protection Regulation, (EU) 2016/679, and applicable national implementing legislation.
- “GDPR”** means the EU GDPR and/or the UK GDPR, as applicable.
- “Newly Weds Foods”** means Newly Weds Foods Acquisitions Limited incorporated and registered in England and Wales with company number 04367744 whose registered office is at Owl Lane, Ossett, West Yorkshire, WF5 9AX; together with its affiliates, which includes subsidiaries and entities that Newly Weds Foods owns globally without

limitation, our UK, EU and PRC branch offices and legal entities listed in Annex 1 (“we”/ “our” / “us”)

- "Personal Data"** means any information relating to an identified or identifiable individual (a "data subject"). An identifiable individual is one whose identity can be established by one or more identifiers (for example, their name) specific to that individual.
- "PIPL"** means the Personal Information Protection Law of the People’s Republic of China.
- "PRC"** means the People’s Republic of China, which, solely for the purposes herein, is exclusive of Taiwan, Hong Kong and Macau.
- "Schrems II"** means the European Court of Justice decision in Case C-311/18
- "Special Categories of Personal Data"** Personal Data that is more sensitive, and to which Applicable Data Protection Laws provide more protection, for example: Personal Data revealing racial or ethnic origin; Personal Data revealing political opinions; Personal Data revealing religious or philosophical beliefs; Personal Data revealing trade union membership; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person’s sex life; and data concerning a person’s sexual orientation. The term “Special Categories of Personal Data” includes the “sensitive personal information” under the PIPL.
- "Suppliers"** means an individual or legal entity (actual or prospective) in relation to the products and/or services of our suppliers or vendors. This includes Suppliers’ individual employees, customers or suppliers or individuals otherwise associated with Suppliers.
- "Users"** Means users of our websites and those that subscribe to receive newsletters, customer alerts, blogs, invitations to seminars and similar events, contact forms and other marketing materials as well as inputting contact information in our contact form, or sent via email to the email addresses that are available on our websites for users to contact listed.
- "UK"** means the United Kingdom of Great Britain and Northern Ireland.
- "UK GDPR"** means UK legislation incorporating the provisions of the EU GDPR into the body of UK law by virtue of section 3 of the European Union (Withdrawal) Act 2018.