

## **Food Disco Privacy Policy**

### **1 Keeping your data safe**

1.1 We are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

### **2 Who's in control of my personal data**

2.1 Food Disco is run by Food Disco Limited. We are the "controller" of all personal data collected and used for the purposes of providing Food Disco and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

### **3 What data do you collect and where from?**

3.1 The data we collect and where it comes from depends on how you sign up for and use Food Disco. We offer you the option to sign into Food Disco using your Google or Facebook account, in which case we will receive your name and email address from Google or Facebook, as applicable.

3.2 If you choose to register for an account with Food Disco using your email address, we will collect the following information from you:

- 3.2.1 your name;
- 3.2.2 a username and password;
- 3.2.3 your email address; and
- 3.2.4 if you choose to use location services, information about your location.

3.3 We will ask you to provide the name of your building. If we or our food partner offer delivery of orders directly to your address, we will also ask you for your exact address within that building.

3.4 When you order food through Food Disco, we will ask you for your payment details. However, all card details are processed through our payment processing provider, Square, and we do not see or handle your card details.

3.5 We use cookies to collect technical information that we need for our website to function properly. We use cookies to store items in your basket before you check out and (if you accept cookies) to identify you on return visits so that we can show you relevant menus.

### **4 What do you use my personal data for?**

4.1 We use your personal data to set up and administer your account, allow you to log into your account, make sure that you can use Food Disco and all its features and to process your orders. We will use your email address to send you information about Food Disco events, popup stands and upcoming menus; you can opt out of receiving this information when you sign up and at any time afterwards by clicking "unsubscribe" in any of our emails. We will use information that we know about your location (i.e. your selected building name and/or your address) to notify you of Food Disco events near you).

4.2 If you contact us with queries, comments or complaints, we will use your contact details and any other personal data you choose to provide to us to respond to and handle your correspondence.

4.3 We use the technical information we collect about how Food Disco is used, to help us to monitor trends so that we can analyse and improve Food Disco. This helps us to make sure that we are providing you with the best possible service.

## 5 What is your legal basis for using my personal data?

5.1 Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you. The table below tells you what that legal basis is in relation to each of the purposes set out above.

Purpose	Personal data used	Legal basis
Running your account and providing Food Disco	Name, username, password, email address	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to administer your Food Disco account.
Processing and fulfilling orders	Name, address (if applicable), card details	We process this personal data for this purpose on the basis that this information is necessary in order to perform the contract with you to deliver the food that you have ordered.
Responding to queries and comments or other messages	Your contact details and any other information you voluntarily provide to us when contacting us	We process this personal data for this purpose on the basis that this information is necessary for our legitimate interests. We have an interest in making sure that comments and queries are handled appropriately so that they can be resolved for our users.
Monitoring trends, analysing and improving Food disco	The technical information that we collect about your device and how you use Food Disco	We process this personal data for this purpose on the basis that this information is necessary for our legitimate interests. We have an interest in ensuring that we continue to improve Food Disco and provide our users with the best and most effective service possible.
Marketing, including notifying you of Food Disco events near you	Your email address and name, as well as your selected building name or address to identify events near you.	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have a legitimate interest in promoting our business through marketing activities. You can opt out receiving marketing at the time you sign up or at any time by clicking "unsubscribe" in any marketing communications.

## 6 Who do you share my personal data with?

- 6.1 In order to fulfil your order, we will need to share details of your order, your name and (if applicable) your address with the food partner you have ordered food from.
- 6.2 We also use third party service providers to carry out certain services on our behalf, such as sending emails on our behalf. Those third party service providers will have access to your data as part of performing their services for us. They do not use your data for any other purposes.

## **7 Whereabouts is my personal data kept?**

- 7.1 We store your data on secure cloud servers in the UK and we do not transfer your personal data outside the UK and the European Economic Area. If we ever need to do so, we will update this Privacy Policy and we will make sure that the recipient of your data protects it in the same way that it would be protected in the UK.
- 7.2 Our third party service providers mentioned in paragraph 6.1 sometimes store or transfer your personal data outside the EEA and the UK. If this is the case, we ensure that appropriate mechanisms are in place (such as model contract clauses) to ensure that your personal data is treated in the same way as it would be within the UK and the EEA.
- 7.3 In particular, Square (our payment processing provider) is a global organisation and may transfer personal data processed for the purposes of taking payments to countries other than the UK and EEA countries. Square ensures that model contract clauses approved by the European Commission are in place in connection with any such transfers and further information about the countries to which data is transferred is available here: <https://squareup.com/gb/about>

## **8 How long do you keep my personal data for?**

- 8.1 We will keep your personal data for as long as your account remains open. You can close your account at any time by contacting us using the details below. If you close your account, we will delete the personal data associated with your account.
- 8.2 We occasionally need to keep data after account closure requests for limited purposes, for example if we need your data in order to respond to any complaints or claims that you make. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.

## **9 What rights do I have?**

- 9.1 You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.
- 9.2 We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case we will let you know as soon as we can and explain why we need to take longer to respond.
- 9.3 If you want to exercise any of these rights, please contact us at info@foodisco.co.uk.
- 9.4 A right to access your information
  - 9.4.1 You have a right to ask us to send you a copy of all the personal data that we hold about you (subject to some exceptions).
- 9.5 A right to an electronic copy of your information

- 9.5.1 You can also ask us to send you the account information that we hold about you in a common electronic format, or to ask us to transfer that data to a third party if you want us to and if it is technically feasible for us to do so.
- 9.6 A right to object to us processing your information
  - 9.6.1 You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing (as set out in section 5 above).
  - 9.6.2 If you make a request to exercise your right to object, if we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so. Otherwise, we will cease processing your personal data.
- 9.7 A right to ask us not to market to you
  - 9.7.1 You can ask us not to send you direct marketing. You can do this by following the "unsubscribe" instructions in any marketing emails or by changing your account settings, or by contacting us using the details above.
- 9.8 A right to have inaccurate data corrected
  - 9.8.1 You have a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.
- 9.9 A right to have your data erased
  - 9.9.1 You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.
- 9.10 A right to have processing of your data restricted
  - 9.10.1 You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.
  - 9.10.2 Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.

## **10 How can I contact you?**

- 10.1 If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can contact us at [info@fooddisco.co.uk](mailto:info@fooddisco.co.uk).

## **11 What if I have a complaint?**

- 11.1 You have a right to complain to the Information Commissioner's Officer (**ICO**), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.
- 11.2 You can find out how to do this by visiting [www.ico.org.uk](http://www.ico.org.uk).

## **12 What if this policy changes?**

12.1 We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.

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