

## **Privacy and Cookies Policy**

### **INTRODUCTION**

Mindful Chef respects your privacy and is committed to protecting your personal data.

This privacy policy aims to give you information on how we collect and look after your personal data when you visit our website ([www.mindfulchef.com](http://www.mindfulchef.com)), when you purchase our recipe boxes, recipe book or other products and services from us (through our website or by getting in contact with us directly), when you register with us as a customer, when you otherwise contact us and when we deliver the products you have ordered from us. It will also tell you about your privacy rights and how the law protects you.

References to "**you**" or "**your**" are to you as an individual using our website or otherwise contacting Mindful Chef (either on behalf of yourself, your business or another individual or organisation).

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#### **1 IMPORTANT INFORMATION**

- 1.1 It is important that you read this privacy policy together with our [Terms and Conditions](#) and any other privacy policy or fair processing notice we may provide on specific occasions (such as marketing events) when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.
- 1.2 Please note that Mindful Chef may update and amend this privacy policy from time to time and any changes will be posted on our website. This version was last updated on 2 April 2019.
- 1.3 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
- 1.4 Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share

data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

- 1.5 By accessing and continuing to use the Mindful Chef website, you accept the terms of this privacy policy.

## 2 WHO WE ARE

- 2.1 Mindful Chef Ltd is a company incorporated in England and Wales with company number 09270945. Our registered office is 1 Enterprise Way, London, England, SW18 1FZ and is referred to as "Mindful Chef", "we", "us" or "our" in this privacy policy.
- 2.2 Mindful Chef is the provider of low-carb recipe boxes and related products. We operate this website to provide our customers with the ability to purchase from a selection of recipes, so that we can deliver the food boxes straight to the customer. We operate our business on a recurring delivery basis. As such, we need certain personal information to be able to provide you with our products and to operate your account.
- 2.3 Mindful Chef is a data controller and we are responsible for your personal data. We are bound by applicable data protection laws in respect of the handling and collection of your personal data and are registered as a data controller in England and Wales, with the Information Commissioner's Office (ICO) under the ICO number ZA234246.
- 2.4 If you have any questions about this privacy policy, including any requests to exercise your legal rights as set out in the YOUR LEGAL RIGHTS section, please contact us using the contact details in the [CONTACT](#) section.

## 3 THE DATA WE COLLECT ABOUT YOU

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or data relating to a corporate entity.
- 3.2 If you visit our website, contact us about employment opportunities, enquire about our products and services, are a customer making contact with us via our website or by telephone, email, other electronic message or in writing, or a third party gives us your information, we may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:
  - **Identity Data** may include first name, last name, username or similar.
  - **Contact Data** may include delivery / postal address, delivery instructions, email address and telephone/mobile number.
  - **Financial Data** may include payment card holder details (CHD), card type, expiry date and the last 4 digits of your card number.
  - **Transaction Data** may include details about your order history, payment instructions and payment history.
  - **Technical Data** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, use of cookies or other devices to store and sometimes track

information about you (more details on our use of cookies is set out in the Cookies section) and other technology on the devices you use to access this website or our software.

- **Profile Data** may include your user id and password, purchases and orders made by you, your browsing history on our website, any event history, your account details, your interests and preferences including the motivation for choosing our product ('Save Time' / 'Eat Less Carbs' / 'Discover Recipes'), your dietary preferences ('Protein-Packed' / 'Balanced' / 'Pescatarian' / 'Plant-Based'), and food groups that we should exclude (e.g. shellfish), and feedback and survey responses.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing from us (and our third parties who provide marketing services) and your communication preferences.

3.3 **Aggregated Data.** We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or Transaction Data for financial reporting and analysis. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3.4 **Special Categories of Personal Data.** We do not generally collect any special categories of personal data about you. This includes details about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation. However, we may process certain special categories of personal data when you:

- select certain preferences for your recipe boxes (e.g. your dietary preferences ('Protein-Packed' / 'Balanced' / 'Pescatarian' / 'Plant-Based'), and food groups that we should exclude (e.g. shellfish); and
- include such information in your CV which you (or a third party) send to us about employment opportunities with us.

3.5 **Criminal convictions and offences.** We do not actively collect any information about criminal convictions and offences.

3.6 **Children.** Our website is not intended for children and in this respect we do not knowingly collect data relating to children.

## 4 IF YOU FAIL TO PROVIDE PERSONAL DATA

4.1 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 that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services or open up a customer account). In this case, we may have to suspend or cancel a product or service you have with us but we will notify you if this is the case at the time.

## 5 HOW WE COLLECT YOUR PERSONAL DATA

5.1 We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Transaction, Profile, Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, sms, social media or otherwise. This includes personal data you provide when you:
  - purchase any of our products or services;
  - set up (or begin to set up) a customer account with us;
  - make contact with our sales and support teams via email, other electronic messaging, telephone, writing or in person;
  - request marketing be sent to you;
  - enter a competition, promotion or survey;
  - email us about your interest in a job with us; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website we may automatically collect Technical or Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the Cookies section.
- **Third parties or publicly available sources.** We may receive personal data about you from various other third parties and public sources as set out below:
  - Technical and Usage Data from: (i) analytics providers, such as Google, based outside the EU; (ii) advertising networks; and (iii) social media such as Facebook, Instagram and Twitter.
  - Identity and Contact Data from social media such as Facebook, Instagram and Twitter (for example when you like one of our posts or comment).
  - Identity, Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU or within the US (and certified under the EU-U.S. Privacy Shield) for example, all our website financial transactions are currently handled through our payment services provider, Checkout.com. You can review the provider's privacy policy at <https://www.checkout.com/legal/privacy-policy>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
  - Identity and Contact Data from other organisations who have your permission (or another lawful basis) to share information about you with us (which may include data providers such as Experian, Abacus and iBehaviour – please see the THIRD PARTY DATA COOPERATIVES section).
  - Identity, Contact (and possibly Special Categories of Personal Data) from recruitment professionals (or similar) who send us your CV.

## 6 HOW WE USE YOUR PERSONAL DATA

6.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Performance of Contract means processing your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best product/service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can contact us for further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities (please see the CONTACT section).
- Consent means where we have obtained your agreement to process your personal data. Consent must be freely given, specific, informed and be an unambiguous indication of your wishes for us to process your personal data (this may be collected by you ticking a box). Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing material to you via email, post, phone, sms, and social media. You have the right to withdraw consent to marketing at any time by contacting us (please see the [Opting Out / Unsubscribing](#), the [Withdraw consent at any time](#) and the [CONTACT](#) sections).
- Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## 6.2 Purposes for which we will use your personal data

We have set out in the table below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, take your preference details, process your orders, take payment and deliver products and services to you	Identity Contact Financial Transaction Profile Marketing and Communications Special Categories of Personal Data	Performance of a contract Necessary for our legitimate interests (to provide our products and service to you) Necessary to comply with a legal obligation To protect your vital interests

<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>- notifying you about changes to our terms and conditions or privacy policy;</li> <li>- notifying you about changes and progress within our business;</li> <li>- asking you to provide a review or take a survey; or</li> <li>- sending you notifications if you have not used your account and asking if we should close it</li> </ul>	<p>Identity Contact Profile Marketing and Communications</p>	<p>Performance of a contract Necessary for our legitimate interests (to keep our records updated and to study how clients and their customers use our products and services) Necessary to comply with a legal obligation</p>
<p>To receive and respond to enquiries from you about our products and services including potential customers who have started the registration process but have not completed it</p>	<p>Identity Contact Marketing and Communications</p>	<p>Necessary for our legitimate interests (to engage with you and to facilitate the growth of our business)</p>
<p>To receive and respond to sales, customer support and delivery related questions raised by you</p>	<p>Identity Contact Financial Transaction Technical Profile Usage Marketing and Communications</p>	<p>Performance of a contract Necessary for our legitimate interests (to be able to provide our customers with excellent customer service)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>Identity Contact Profile Usage Marketing and Communications</p>	<p>Necessary for our legitimate interests (to study how our customers use our website, to develop it and improve our business)</p>

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Contact Technical Usage</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, software, marketing, customer relationships and experiences</p>	<p>Technical Usage Profile</p>	<p>Necessary for our legitimate interests (to define types of customers of products/services, to keep our website and software updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about our products and services that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products and services and grow our business)</p> <p>Consent</p>
<p>To receive information about you from you or other third parties for the purposes of recruitment</p>	<p>Identity Contact Special Categories of Personal Data</p>	<p>Performance of a contract</p> <p>Necessary for our legitimate interests (in finding and hiring the right people to help grow our business)</p> <p>Consent</p>

To respond to requests for information regarding suspected or actual criminal activity including fraud	Identity	Necessary for our legitimate interests (to prevent and detect crime and fraud)
	Contact	
	Transaction	Necessary to comply with a legal or regulatory obligation
	Technical	Necessary to protect the vital interests of you or another individual
	Profile	
	Usage	
Criminal		

6.3 **Marketing.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

- **To our customers:**

We may send marketing material about Mindful Chef and our selected partners (including email promotions and gifts and special offers in your recipe boxes) to you as a customer if you have given us your express, opt-in consent. When we market to you we may use your Identity, Contact, Technical, Usage, Profile and Marketing and Communications Data.

You may receive marketing communications from us after you have requested information from us or opened a customer account and, in each case, you have opted-in to receiving that marketing.

You can withdraw your consent at any time (please see the [Opting Out / Unsubscribing](#) section).

- **To non-customers:**

We may send marketing material about Mindful Chef to you by post, if we have received your data from another organisation who has your permission (or another lawful basis) to share information about you with us for postal marketing purposes (which may include data providers such as Experian, Abacus and iBehaviour) – please see the [THIRD PARTY DATA COOPERATIVES](#) section.

You can opt-out of this marketing at any time (please see the [Opting Out / Unsubscribing](#) section).

- **Opting Out / Unsubscribing:**

You can ask us to stop sending you marketing messages at any time by logging into your account (if you are a customer) and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out / unsubscribe links on any marketing message sent to you or by contacting us at any time (see the [CONTACT](#) section).

Where you opt out of receiving these marketing messages, you may still receive messages for other purposes (such as providing the products and services to you).

6.4 **Cookies.** Our website uses cookies to distinguish you from other users of our website.



This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, users are agreeing to our use of cookies.

- A cookie is a small file of letters and numbers that we store on your browser or the hard drive of their computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.
- Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
- You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you disable or refuse cookies when browsing our website, please note that some parts of our website may become inaccessible or not function properly.

6.5 **Change of Purpose.** We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, you can contact us (please see the [CONTACT](#) section).

- If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7 DISCLOSURES OF YOUR PERSONAL DATA

7.1 For the purposes set out in the [HOW WE USE YOUR PERSONAL DATA](#) section we may have to share your personal data with the following parties:

- External Third Parties such as:
  - Service providers and developers based in (and outside) the UK who provide IT and system administration (including email, payment software and hosting) services.
  - Specialist suppliers for the packing, dispatch and delivery of our products (based in the UK).
  - Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, legal, banking, accounting insurance and services.
  - HM Revenue & Customs, regulators, law enforcement bodies, police and other authorities based in the UK who require reporting of processing activities in certain circumstances (such as criminal activity, suspected or actual fraud or tax evasion).
  - Marketing and PR agencies based in the UK to help us with data analysis, social media marketing and other marketing (including if you agree to a publication / article with us).

- Data providers / cooperatives based in the EU where we have your consent or another lawful basis for processing so that third parties can market to you by post only.
- Specific Third Parties such as Amazon Web Services (AWS) a cloud hosting provider, with their server based in Europe, who provide application servers and cloud storage.
- Third parties 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 policy.

7.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers 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.

## 8 INTERNATIONAL TRANSFERS

8.1 We do not process your personal data in any country outside the European Union (including the UK) (**EU**).

8.2 However, certain third parties that we deal with are based outside of the EU, so their processing of your personal data will involve a transfer of data outside the EU.

8.3 Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-U.S. Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

8.4 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

## 9 DATA SECURITY

9.1 We have put in place appropriate security measures (including SSL technology) 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

9.2 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.

## 10 DATA RETENTION

How long will you use my personal data for?

- 10.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 10.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 10.3 We will generally retain our clients' data for a period of 7 (seven) years after a contract has ended, to ensure that we are able to assist you should you have any questions or feedback in relation to our products or services or to protect, or defend our legal rights, or for tax purposes.
- 10.4 Where we have processed your personal data to provide you with marketing communications with consent, we may contact you at least every 12 (twelve) months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our marketing lists (and will be added to a "do not contact" list).
- 10.5 Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with services or in relation to recruitment), we will retain your data for 9 (nine) to 12 (twelve) months.
- 10.6 In some circumstances you can ask us to delete your data; please see the [YOUR LEGAL RIGHTS](#) section for further information.
- 10.7 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 11 YOUR LEGAL RIGHTS

- 11.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are detailed below:
  - **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we

may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11.2 If you wish to exercise any of the rights set out above, please contact us directly (please see the [CONTACT](#) section).

- **No fee usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 12 CONTACT DETAILS AND COMPLAINTS

12.1 Our full details are:

Full name of legal entity: Mindful Chef Ltd  
Email address: hello@mindfulchef.com  
Postal address: 1 Enterprise Way, London, SW18 1FZ  
Telephone number: 020 3950 0455

12.2 You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 13 THIRD PARTY DATA COOPERATIVES

13.1 In accordance with legitimate interest (where you have not opted-out), we may share your name and address (but never your email address or phone number) with other companies whose products or services may interest you. We do this by working with the following data providers or 'co-operatives' who also help us to find new customers for our business:

- Experian Limited
- Epsilon Abacus (registered as Epsilon International UK Ltd) which manages 'Abacus Alliance'
- iBehaviour (registered as Conexance)

13.2 These cooperatives manage their own group of UK retail brands. If you've not opted out, we share details about your transactions (e.g. how much you've spent and when) and your name and address. They pool this information from all the retail brand members together so that they can highlight spending patterns and analyse what sort of products might interest you and pass your name and address to their retail brand members whose products are likely to appeal to you. We are unable to give you an exact list of those retail brands as they change all the time, but they are all active in the following product categories: clothing, home and garden, collectables, food and wine, gadgets and gifts, entertainment, health and beauty, travel and leisure. Under applicable data protection laws, this might qualify as profiling. If you do not wish us to use your data for this purpose, please contact us (see the [CONTACT](#) section).

13.3 Please note that these cooperatives may transfer data outside the European Economic Area (including the UK). The transfer will take place in the presence of appropriate safeguards, including standard data protection clauses adopted by the EU Commission. If you would like more information, please contact us (see the [CONTACT](#) section).