# Local Food Links Ltd – Privacy Notice for parents, guardians, carers and their children

**Data controller:** Local Food Links Ltd, Unit 17 St. Michael's Trading Estate, Bridport, Dorset, DT6 3RR.

**Data protection officer:** Caroline Morgan, Chief Executive, Local Food Links Ltd, Unit 17 St. Michael's Trading Estate, Bridport, Dorset, DT6 3RR. Email: caroline.morgan@localfoodlinks.org.uk . Tel. no. 01308 428919.

## About Local Food Links and your privacy

Local Food Links is a not-for-profit social enterprise that provides a school meals service for First, Middle and Primary schools, as well as several nurseries, in Dorset and Devon. We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers including parents, guardians, carers and children, and will only collect and use personal data (also referred to as 'personal information' in this document) in ways that are described here, and in a way that is consistent with our obligations and your rights under the law. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

## What personal information does Local Food Links collect?

We collect and process a range of information about parents, guardians, carers and children who access our school meals service. This includes:

- name, address and contact details, including email addresses and telephone numbers;
- your relationship to the child for whom the school meal(s) is ordered;
- your child's name, class, year group, school and whether they are entitled to free school meals; and
- details of any allergies that your child may have together with medical evidence.

Personal information that we collect about allergies is considered a special category of sensitive personal data.

#### How is the personal information collected?

We collect and process personal information relating to parents, guardians, carers and their children in a variety of ways. For example, data might be obtained from our online ordering system when school meal orders are placed or a user account is created. Additionally personal data will be collected when you sign up to receive our newsletter. Other data may be obtained if you contact us with a query by phone, email or letter regarding a school meal for your child, for example in relation to an allergy.

We will also collect personal data about you and your child from third parties, such as from pupil lists obtained from your child's school. Any photographs of pupils used by Local Food Links are published with the consent of that pupil's school, who has sought consent from parents/guardians.

Personal data is stored in a range of different places, including in our ordering system, on our website and in other IT systems (including the Company's email system).

# Why does Local Food Links process personal data?

We will only use personal information related to you and/or your child when the law allows us to. We process this personal information for the purposes listed in this document relying on one or more of the following lawful grounds:

- where we need to perform the service you have requested, or in order to take any pre-delivery steps at your request, i.e. to provide your child with a suitable meal;
- where it is necessary for us to comply with a legal obligation;
- where you have freely provided your specific, informed and unambiguous consent for particular purposes; and,
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

For example, we need to process data to take steps at your request to plan for and provide your child with a suitable school meal. In some cases, we need to process data to ensure that we are complying with Health & Safety and other legal obligations. For example, in relation to allergies that a child might have or their eligibility for free school meals.

In other cases, we have a legitimate interest in processing personal data which allows us to:

- plan, process and provide adequate quantities and types of school meals, including those suitable for children with various allergies;
- communicate with parents, guardians, carers and their children to gain feedback on the service we provide;
- provide information to those who have signed up to our newsletter subscription service;
- operate and keep records of our business activities and growth;
- operate and keep records detailing popularity and take up of the different school meals that we provide;
- respond to and defend against legal claims;
- meet our obligations under Health & Safety law and Safeguarding.

Where we rely on our legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by your rights and freedoms and have concluded that they are not.

#### Who has access to your data?

Your information and/or your child's information may be shared with appropriate central team staff, senior management within the Company, the Kitchen Manager and delivery staff in the respective kitchen which will prepare and deliver the meal for your child, and IT staff of this Company if access is necessary for the performance of their role.

We also share your own and your child's personal data with your child's school in order that they can know which child is to have a meal and what type of meal that is. Third parties who are involved in the operation of our website and on-line ordering system, may also have access to your own and our child's personal data in the general performance of their duties. Our website <u>www.localfoodlinks.org.uk</u> does not use or place cookies. It does contain links to information on other websites, such as <u>The Independent School Food Plan</u>. Our online meal ordering system <u>https://my.localfoodlinks.org.uk</u> uses session cookies. These are temporary and expire once you log off or close the browser. This privacy notice only applies to our own websites so when you link to other websites you should read privacy statements that belong to them specifically.

We will not transfer your own or your child's personal data outside of the European Economic Area. We will also not sell or rent your own or your child's personal information to third parties for marketing purposes.

#### How does Local Food Links protect your data?

We take the security of your own and our child's personal data seriously. We have internal policies and controls in place to try to ensure that personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed (unless stated otherwise within this privacy notice) by anyone other than our employees in the performance of their duties. All of our Company computers are password protected.

Printed copies of personal data that are no longer needed are disposed of using confidential waste systems such as shredding and/or collection and secure destruction by certified confidential waste operators.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We will seek further information to confirm the identity of parents, guardians or carers who request access to their own or their child's personal data, so that we can be sure the data is only released to the appropriate person.

We do not collect any bank or payment details as all online payments are managed through secure PayPal or World Pay systems.

#### How long does Local Food Links keep data?

Data is kept until a pupil leaves a school and is then archived and scrambled before being periodically deleted.

# Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your own or your child's personal data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your own or your child's data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your own or your child's data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if personal data is inaccurate or there
  is a dispute about whether or not your interests override our legitimate grounds
  for processing that data.

If you would like to exercise any of these rights, please contact Caroline Morgan, Chief Executive, Local Food Links Ltd, Unit 17 St. Michael's Trading Estate, Bridport, Dorset, DT6 3RR, or email her at <u>caroline.morgan@localfoodlinks.org.uk</u>. Alternatively, you can make a subject access request by completing the Company's form for making a subject access request. If you believe that we have not complied with your data protection rights, you can complain to the <u>Information Commissioner</u>.

## What if you do not provide your personal data?

You are under no statutory or contractual obligation to provide data to Local Food Links. However, if you do not provide certain information, we may not be able to correctly process your order for a suitable school meal for your in part or at all.

## Unsubscribing from newsletters and data lists

If you no longer wish to subscribe to our newsletter or any other Mailchimp documents we may forward by email, you can unsubscribe at any time by clicking the link in the newsletter or by contacting Natasha Elliott, Marketing & Communications Officer at Local Food Links, by either emailing her on <u>natasha.elliott@localfoodlinks.org.uk</u> or telephoning her on 01308 428922.

## Changes to this privacy notice

Local Food Links Ltd reserve the right to update this privacy notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

**If you have any questions about this privacy notice, please contact the Data Protection Officer:** Caroline Morgan, Chief Executive, Local Food Links Ltd, Unit 17 St. Michael's Trading Estate, Bridport, Dorset, DT6 3RR. Email: <u>caroline.morgan@localfoodlinks.org.uk</u> Tel: 01308 428919.

# Issued for and on behalf of Local Food Links Ltd

Signed: .....

**Caroline Morgan – Chief Executive** 

October 2021