

General Data Protection Statement for *safefood*

Last Updated: October 2022

In this Data Protection Statement you will find the following information laid out in sections to make it easier to find the information you want.

At the end of the main document you will also find information that is specific to the services you interact with so that you can just read information that is relevant to that specific service.

Contents

About <i>safefood</i>	2
The purpose of this Data Protection Statement	2
Who this Data Protection Statement applies to	3
Categories of Personal Data	3
Our legal basis for processing Personal Data	4
Our processing activities	4
Sources of Personal Data	7
Disclosure of Personal Data	8
Security measures	8
Transfers outside the EEA	9
Cookies	9
Third party websites	9
Retention	9
Your rights	11
Amendments to this Data Protection Statement	12
Our contact information	13
Supervisory authority	13
Data Protection Statement – Weight Loss Tool	14

Contact Details

If you have any questions about this Data Protection Statement or the way in which your Personal Data is being used by us please contact:

Data Protection Officer
7 Eastgate Avenue
Eastgate
Little Island
Co. Cork, T45 RX01

Email: dpo@safefood.net

Telephone: 086 6016002

“**Personal Data**” means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

About *safefood*

References to “**We**”, “**Us**” and “**safefood**” in this Data Protection Statement shall apply to organisation that is processing your Personal Data.

safefood is an all-island implementation body set up under the British-Irish Agreement with a general remit to promote awareness and knowledge of food safety and nutrition issues on the island of Ireland.

In order to provide our services, we need to process Personal Data. We are committed to protecting the rights and privacy of individuals in accordance with data protection legislation including the General Data Protection Regulation in Europe (the “**GDPR**”).

The Purpose and Structure of this Data Protection Statement

This Data Protection Statement describes our approach to data protection and sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be used by us where we are controllers of that Personal Data for the purposes of the GDPR. Please read this Data Protection Statement carefully to understand our views and practices regarding the Personal Data we collect and how we will treat it.

The protection of your Personal Data is important to us and we are committed to protecting and safeguarding your rights.

We have used a layered approach to try to ensure you can find the information that you need about our processing activities. Our Data Protection Statement is structured as follows:

- General Data Protection Statement: Provides general Data protection related information
- safefood.net/healthy-weight-for-you: Provides information about the processing of data collected through our online weight loss tool which sets calorie bands, meal plans and weight range goals/ progress and anonymises data to be used for reporting.

Who this Data Protection Statement Applies to

This Data Protection Statement provides specific information relating to the following individuals whose Personal Data we process:

- (i) contact data of those we engage with as part of the day-to-day operation of **safefood** including our customers, suppliers and partners, members of the public and committee and board members “**safefood Contacts**”; and
- (ii) prospective employees/those applying for jobs at **safefood** “**Candidates**”;
- (iii) users/guests of our Website “**Website Users**”.
- (iv) users of our Weight loss tool

Personal Data of employees of **safefood** is dealt with in a separate internal data protection notice

Categories of Personal Data

We process the following categories of Personal Data. For each category we have included an example of the type of Personal Data that maybe part of that category:

- **Identification Data** may include a person’s name, date of birth, driver’s license and passport information.
- **Contact Data** may include a person’s email address, phone number, postal address, other communication details (e.g. Skype)
- **Communication Data** may include phone calls, email correspondence and hard copy correspondence.
- **Marketing Data** may include your Contact Data and any preferences in receiving marketing from us and your communication preferences.
- **Recruitment Data** may include recruitment related data such as Identification Data, Contact Data, Communication Data, CV and job application data. When processing CV data, we may process certain Personal Data including the following: employment history, skills/ experience, languages, educational history, qualifications, membership of professional associations, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations, interview/screening answers and notes.
- **Financial Data** may include payment related information or bank account details and financial data.
- **Travel & Subsistence Data** may include Contact Data and other travel and subsistence claims from board members or other members of the public.
- **Special Category Recruitment Data** If we interact with you for the purposes of a job with **safefood**, we may collect Recruitment Data that is of a special category per the GDPR definition: this can include diversity data such as gender, religion, racial or ethnic origin, sexual orientation, trade union membership or data relating to health. We will only source this data with the explicit consent of Candidates.
- **Web Data** may include Personal Data provided on any forms on our website and, to the extent that it includes Personal Data, information on the type of device you’re using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

Our Legal Basis for Processing Personal Data

We process all Personal Data lawfully and in accordance with the requirements of the law. The GDPR sets out the legal grounds for processing Personal Data.

When **safefood** processes Personal Data it is generally on one of the following legal basis:

Contract

We will process Personal Data where necessary to perform our obligations relating to or in accordance with any contract that we may have with you or to take steps at your request prior to entering into that contract;

Consent

For certain processing activities we may rely on your consent.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so.

You can withdraw consent provided by you at any time by contacting us at .

Legitimate Interest

At times we will need to process your Personal Data to pursue our legitimate interests, for example for administrative purposes, to collect debts owing to us, to provide information to you, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests or fundamental rights and freedoms outweigh our legitimate interests. You may object to any processing we undertake on this basis. If you do not want us to process your Personal Data on the basis of our legitimate interests, contact us at dpo@safefood.net and we will review our processing activities.

Legal Obligation

If we have a legal obligation to process Personal Data, such as the payment of taxes, we will process Personal Data on this legal ground.

Our Processing Activities

We use your Personal Data to provide you with our services and to assist us in the operation of **safefood**. Under data protection law, we must ensure that the purpose of processing is clear.

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing:

Service Delivery activities

Purpose of Processing

- to contact you re payments to and from you;
- for relationship management and support;
- to send notifications about changes/updates to our products and services;
- to fulfil our legal and contractual obligations.

Categories of personal data

- Identification Data

- Contact Data
- Communications Data

Lawful basis

- Contract
- Legitimate Interest

safefood.net/healthy-weight-for-you

Categories of personal data

- Identification Data
- Contact Data
- Communications Data

Lawful basis

- Consent

Marketing activities

Purpose of processing

- to respond to any requests from you
- to send newsletters and other information that maybe of interest
- to contact you as part of our relationship or for general administration
- to inform you of events or webinars that might be of interest
- to deliver and organise our conferences, seminars, events

Categories of personal data

- Marketing Data
- Contact Data
- Web data

Lawful basis

- Consent
- Legitimate interest

Recruitment Activities

Purpose of processing

- as part of agency shortlisting
- to select the right Candidate
- to interview the Candidate
- to hire and seek to onboard the Candidate (pre contract)
- to manage our database of prospective Candidates

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Recruitment Data
- Web Data
- Marketing Data
- Special Category Recruitment Data

Lawful basis

- Consent
- Legitimate interest
- Contract
- Legal Obligation

Website Delivery

Purpose of processing

- to respond to web forms completed by you;
- to promote our services;
- to administer the Website; and
- for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes
- to ensure the safety and security of our website and our services.

Categories of personal data

- Contact Data
- Web Data

Lawful basis

- Consent
- Legitimate Interest

Administration of Relationship

Purpose of processing

- to manage/respond to a complaint/appeal
- to notify you of updates to this Data Protection Statement
- to pay any agreed travel and subsistence

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Financial Data

Lawful basis

- Contract
- Legitimate interest

Managing payments and administration of the contract

Purpose of processing

- to process payments to and from the organisation.

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Financial Data

Lawful basis

- Contract
- Legitimate Interest

Governance

Purpose of processing

- to take minutes at committee meetings and for administration of committees of **safefood**
- to manage the governance programme in the organisation
- to enter into partnerships and other commercial relations
- to undertake appropriate due diligence
- to pay travel and subsistence to board and committee members
- to undertake declaration of interest to ensure there is no conflicts of interest

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Financial Data
- Travel & Subsistence Data

Lawful basis

- Contract
- Legitimate Interest
- Legal Obligation

Sources of Personal Data

safefood Contact Personal Data

We collect Personal Data from our general contacts including – customers, suppliers, partners and members of the public.

We source **safefood** Contact Personal Data in order to manage the organisation and deliver our services. We will only ever source Personal Data that is necessary and in a way that would be generally expected.

We receive Personal Data about **safefood** Contact from a variety of sources, as follows:

- the Personal Data is often provided by the **safefood** Contact as part of the relationship;
- the Personal Data may be collected from public sources;
- the Personal Data may be collected indirectly from another person within the same organisation as the **safefood** Contact;
- the Personal Data may be collected through our website;
- the Personal Data may be collected through the weight loss tool
- the Personal Data may be collected indirectly from a website or from a third party.

Candidate Personal Data

We will only ever source Personal Data in a way that would be generally expected.

We receive Personal Data relating to Candidates from a variety of sources. The primary source is from Candidates directly. Examples of the sources of Personal Data of Candidates are as follows:

- the Candidate may send their CV to us with the intention of registering with us to be informed of potential job vacancies;
- the Candidate may apply directly to a position advertised on our website;
- the Candidate may apply to a position advertised on a third-party jobs' website;

Web data

We collect Website User Personal Data from all visitors to our website in order to improve our services and develop the Website.

We receive Web Data about Website Users who access our advertisements or our Website regardless of whether they interact or register with the Website.

For more details please refer to our [Cookie Notice](#).

Disclosure of Personal Data

In certain circumstances, we may disclose Personal Data to third parties as follows:

- to partners and subcontractors for the performance of any contract relating to our services, including email, Skype, Customer Relationship Management system, payment processors, data aggregators, hosting service providers, external consultants, auditors, IT consultants and lawyers;
- to any recruitment agency who is helping us to recruit Candidates;
- to analytics and search engine providers that assist us in the improvement and optimisation of the Website;
- if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation (including tax, audit or other authorities), or in order to enforce or apply any contracts that we have;
- to protect our rights, property, or safety, or that of our Candidates or **safefood** Contact or others. This may include exchanging Personal Data with other companies and organisations for the purpose of fraud protection.

When we engage another organisation to perform services for us, we may provide them with information including Personal Data, in connection with the performance of those functions. We do not allow third parties to use Personal Data except for the purpose of providing these services.

Security Measures

We will take all steps reasonably necessary to ensure that all Personal Data is treated securely in accordance with this Data Protection Statement and the relevant law, including the GDPR.

In particular, we have put in place appropriate technical and organisational procedures to safeguard and secure the Personal Data we process.

We monitor for and do everything we can to prevent security breaches of the Personal Data that we process.

Once we have received your Personal Data, we will use strict procedures and security features for the purpose of preventing unauthorised access and ensuring that only those who need to have access to your Personal Data can access it.

We also use secure connections to protect Personal Data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

Transfers outside the EEA

In order to provide our products and services we may need to transfer Personal Data outside the European Economic Area (EEA). We ensure that any transfer of Personal Data outside the EEA is undertaken using legally compliant transfer mechanisms and in accordance with the GDPR.

If we transfer Personal Data outside of the EEA, we generally rely on the Standard Contractual Clauses under Article 46.2 of the GDPR adopted by the EU Commission or the Privacy Shield in the case of transfers to the USA. We may also rely on some of the other legally compliant transfer mechanisms provided under the GDPR.

Cookies

Cookies are small text files placed on your computer or mobile device by websites that you visit, and they help us improve the products and services that we offer you. They are used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies may allow a website to remember your activity over a period of time. Cookies are optional and you do not have to accept them.

Further information on the cookies we use on the website and the purpose behind their respective uses are set out in our [Cookie Notice](#). You can manage cookies using our cookie management tool by clicking on the letter “C” in the corner of the page.

Third party websites

Our Website may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy settings, and these are not endorsed by us. We do not accept any responsibility or liability for these third-party websites. Please undertake the appropriate due diligence before submitting any Personal Data to these websites.

Retention

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Our retention policy is as follows:

Service Delivery Activities

Categories of personal data

- Identification Data
- Contact Data
- Communications Data

Retention period

- 24 months after completion of service delivery activities in the case where there is no further meaningful engagement.

safefood.net/healthy-weight-for-you

Categories of personal data

- Identification Data
- Contact Data
- Communications Data

Retention period

- Data is retained for two weeks after completion (or 14 days after a period of 21 days of inactivity.)

Marketing and Promotion Activities

Categories of personal data

- Marketing Data
- Contact Data
- Web Data

Retention period

- 12 months in the case where no meaningful engagement or earlier in the case you unsubscribe.

Recruitment Activity

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Recruitment Data
- Web Data
- Marketing Data
- Special Category Recruitment Data

Retention period

- 18 months for Candidates who are not hired.
- Candidates who have consented will remain on the database for other positions with the organisation until consent is withdrawn or there is no meaningful engagement over a period of time.
- A separate retention policy applies to employees

Website Delivery

Categories of personal data

- Web Data

Retention period

- 12 months or otherwise as specified in the [Cookie Notice](#)

Managing Payments and administration of the contract

Categories of personal data

- Identification Data
- Contact Data
- Communication Data

Retention period

- 7 years

Governance

Categories of personal data

- Identification Data
- Contact Data
- Communication Data
- Financial Data

Retention period

- 7 years unless require to retain indefinitely

In certain cases, we may retain Personal Data for longer than specified here if required under relevant laws or in the event of any legal claim.

Your Rights

You have various rights relating to how your Personal Data is used.

Right of access to the Personal Data we hold on you

You have the right to ask for all the Personal Data we have about you. When we receive a request from you in writing, we must give you access to everything we've recorded about you as well as details of the processing, the categories of Personal Data concerned and the recipients of the Personal Data.

We will provide the first copy of your Personal Data free of charge, but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your Personal Data in some limited cases including where this might adversely affect the rights and freedoms of others.

Right of rectification of Personal Data

You should let us know if there is something inaccurate in your Personal Data.

We may not always be able to change or remove that Personal Data, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Right of erasure of Personal Data (right to be forgotten)

In some circumstances you can ask for your Personal Data to be deleted, for example, where:

- your Personal Data is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your Personal Data (where there is no other lawful basis for us to use it)
- there is no lawful basis for the use of your Personal Data
- deleting the Personal Data is a legal requirement

Where your Personal Data has been shared with others, we will do what we can to make sure those using your Personal Data comply with your request for erasure.

Please note that we can't delete your Personal Data where:

- we are required to have it by law
- it is used for freedom of expression
- it is used for public health purposes
- it is used for scientific or historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

Right to restrict what we use your Personal Data for

You have the right to ask us to restrict what we use your Personal Data for where:

- you have identified inaccurate Personal Data, and have told us of it
- where we have no legal reason to use the Personal Data, but you want us to restrict what we use it for rather than erase the Personal Data altogether

When Personal Data is restricted it can't be used other than to securely store the Personal Data and with your consent to handle legal claims and protect others, or where it's for important public interests.

Right to have your Personal Data moved to another provider (data portability)

You have the right to ask for your Personal Data to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your Personal Data with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

Right to object

You have the right to object to processing of your Personal Data which is based on public interest or legitimate interest processing. We will no longer process the Personal Data unless we can demonstrate a compelling ground for the processing.

Right not to be subject to automated decision-making

You have the right not to be subject to a decision based solely on automated processing. This right shall not apply where the processing is necessary for a contract with you, or the processing is undertaken with your explicit consent or the processing is authorised by law.

You can make a complaint

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

Amendments to this Data Protection Statement

We will post any changes on the Website and when doing so will change the effective date at the top of this Data Protection Statement. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services.

In some cases, we may provide you with additional notice of changes to this Data Protection Statement, such as via email. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

Our Contact Information

Thank you for reading our Data Protection Statement. Please [Contact Us](#) if you have any questions. If we are unable to resolve your concerns, you have the right to contact the supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached.

Supervisory Authority

The Supervisory Authority in Ireland may be contacted as follows:

Online Form: <https://forms.dataprotection.ie/contact>
Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
Tel: +353 578 684 800 or +353 761 104 800

Data Protection Statement – *safefood* Healthy Weight for You

Overview of the Healthy Weight for You Data

We want to explain clearly how we process your Personal Data when you apply for and use the weight loss tool.

In order to provide our Healthy Weight For You services, we need to collect Personal Data in order to set-up and manage your Healthy Weight For You profile.

Categories of Personal Data

We process personal data as a result of your interaction with our Healthy Weight For You tool.

When you register for and use our Healthy Weight For You tool, we process the following categories of personal data.

- **Registration data:** This includes age, height, gender, weight, waist measurements, email address, username, and password
- **Contact Data:** This includes name and email address
- **Log data:** This includes data about your use of our Healthy Weight For You tool, including data about the time and date of your interaction as well as IP address and transaction information.
- **Health Data:** Dietary Requirements (Vegetarian/Not Vegetarian) & Gender
- **Correspondence Data:** If you complete an online enquiry form, we will record details of your enquiry and our correspondence.

Processing Activities

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

We have to process Personal Data legally. We collect data when you interact with our Healthy Weight For You tool in order to provide a secure service.

Purpose of Processing: To register you for your Healthy Weight For You Profile

Categories of Personal Data

- Registration data

Lawful basis

- Public interest
- Consent

Purpose of processing: To process your Healthy Weight for You instructions

Categories of personal data

- Health data

Lawful basis

- Public interest

Purpose of processing: To manage security of the Healthy Weight For You tool.

Categories of personal data

- Log data

Lawful basis

- Public interest

Sources of Personal Data

We receive information from you when you register for the Healthy Weight For You tool and whenever you interact with those services from logging into your online profile to safefood Website

This information is collected from you directly as a result of your interaction with the safefood Weigh to Live tool.

Retention

Generally, data collected specifically for delivery of our Healthy Weight For You tool is kept until you delete your profile. Data is retained for two weeks after completion (or 14 days after a period of 21 days of inactivity.) Data is anonymised after retention period.

Note that this section of the **safefood** Data Protection Statement relates only to how we process data relating to the **safefood** Healthy Weight For You tool.

We provide information about how we process your data when you interact with any of the **safefood** services such as Healthy Weight For You tool on a service-by-service basis.