



GDPR Privacy Policy

1. About Us

Scotbake Ltd is an independent Inverness bakery producing delicious, fresh and high quality products for the retail, wholesale and food service markets. We deliver fresh across the Highlands and Islands Monday to Saturday. We also provide a distribution service for third party suppliers.

2. GDPR Principles

We are a data controller. This means that we are required by law to ensure that everyone who processes personal data and special categories of personal data during the course of their work with us does so in accordance with the data protection legislation, including the GDPR principles. In brief, the principles say that:

- Personal data must be processed in a lawful, fair and transparent way.
- The purpose for which the personal information is collected must be specific, explicit and legitimate.
- The collected personal data must be adequate and relevant to meet the identified purpose.
- The information must be accurate and kept up to date.
- The personal data should not be kept in a form which permits identification of a data subject for longer than is necessary for the purposes for which it is used.
- The personal data must be kept confidential and secure and only processed by authorised personnel.

3. Collected Personal Data

The personal data we need to collect in order to transact our business is as follows:

a. Customer Data

To provide the best possible service to our customers we need to hold and process certain information on those customers. Scotbake Ltd only requires personal details that will genuinely help us to deliver our service, such as name, job role and contact details. Contact details include, but are not limited to, telephone number, email address and first and last names.

Where we have entered in a contractual agreement with our customers to deliver products and services we will process the appropriate and required information in order to do so, for example the address details of the company.

The personal data we collect will be used for the following purposes:

- Fielding queries from our customers regarding our joint business transactions.
- Making customers aware of new products and services we offer.

b. Supplier Data

To provide the best possible service to our suppliers we need to process certain information. Scotbake Ltd only requires personal details that will genuinely help us to deliver our service, such as name, job role and contact details. Contact details include, but are not limited to, telephone number, email address and first and last names.

We also need other information such as Supplier bank details so that we can pay for the services you provide.

The personal data we collect will be used for the following purposes:

- Fielding queries from our suppliers regarding our joint business transactions.

c. Partner data

We think it reasonable that if we have transacted business with a partner within the past 7 years, that there is legitimate interest that a partner will continue to benefit from continued communication from Scotbake Ltd, even if we are not directly trading with the partner any longer, until that time limit is exceeded. At this point, we will dispose of any personal information held on the partner in accordance with our Secure Disposal of Storage Media Procedure

Additionally, we want to provide potential partners with the opportunity to hear about our products and services and request additional information from us. We therefore deem it that if you operate in a sector that regularly benefits from our products and services and your information has been made available in the public domain that we can contact you to advise you of our products and services.

We will have an upfront and honest approach to this and provide you with the opportunity to opt out of any further communications from us.

4. Our Legal Basis for Processing the Personal Data

Article 6(1)(f) of the GDPR states that we can process your data where it “is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.

a. Contractual

Article 6(1)(b) gives us lawful basis for processing personal data where; “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

In this context, a contract does not have to be a formal signed document, or even written down, as long as there is an agreement which meets the requirements of contract law. Broadly speaking, this means that the terms have been offered and accepted, you both intend them to be legally binding, and there is an element of exchange (usually an exchange of goods or services for money, but this can be anything of value).

b. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Scotbake Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing or contacting us via telephone contact details are supplied within this policy.

5. Disclosure

Scotbake Ltd will not pass on your personal data to third parties without first obtaining your written consent.

6. Retention Period

Scotbake Ltd will process personal data for and will store the personal data according to the following schedule:

Partner Type	Retention Period
Customer	7 years after the date of the last customer invoice or credit note
Supplier	7 years after the date of the last supplier invoice or credit note
Other Partner	7 years after the date of the last direct communication from the Partner to Scotbake Ltd

7. Your Rights as a Data Subject

At any point whilst we are in possession of, or are processing, your personal data, you, the data subject, have the following rights:

- a. Right of access* – you have the right to request a copy of the information that we hold about you.
- b. Right of rectification* – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- c. Right to be forgotten* – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- d. Right to restriction of processing* – where certain conditions apply to have a right to restrict the processing.
- e. Right of portability* – you have the right to have the data we hold about you transferred to another organisation.
- f. Right to object* – you have the right to object to certain types of processing such as direct marketing.
- g. Right to object to automated processing, including profiling* – you also have the right to be subject to the legal effects of automated processing or profiling.
- h. Right to judicial review* – in the event that Scotbake Ltd refuses your request under rights of access, we will provide you with a reason as to why.

8. Data Representative Contact details

Contact Name	Derek Smith
Address	Scotbake Ltd 1 Burnett Road Inverness IV1 1RZ
Email	info@scotbake.com
Telephone	01463 711357