

The Fresca Group Website Privacy Notice

1. What is the purpose of this notice and who does it cover?

- 1.1. This privacy notice (**Notice**) gives you information about how the Fresca Group Limited (please refer to section 15 for the list of the Fresca Group entities) (**the Fresca Group, we, us or our**) collects and processes your personal data, when you use visit our Website (please refer to section 15 for the list of the Fresca Group websites) referred to in this notice as (**the Website**).
- 1.2. Our services and our website are not intended for children, and we do not knowingly collect personal data relating to children. References in this notice to “**you**” or “**your**” are references to individuals whose personal data we process.

2. Who can I contact if I have any questions?

- 2.1. If you have any questions about this notice or the information we hold about you, including any requests to exercise your rights under data protection law, please contact us, using via email on dataprotection@frescagroup.co.uk.

3. What happens if this notice is updated or my personal data changes?

- 3.1. This version of the Notice was last updated on 1 September 2025, and any historic versions can be obtained by contacting us at
- 3.2. We will publish any changes to this Notice on our Website and where necessary we will also send you a copy via email.

4. The personal data we collect about you

- 4.1. Personal data is any information which directly or indirectly identifies an individual, for example, your name, address, email address or contact details. This does not include any information that does not, and cannot be used to, identify an individual.
- 4.2. You give us your personal data through your use of our Website or when you visit one of our premises in person.
- 4.3. We also collect personal data from you indirectly such as your browsing activity while on our Website. Please see the Cookie Section below for more information.
- 4.4. We also collect personal data from other sources as set out below.

5. Personal data collected directly from you

- 5.1. The personal data we collect about you depends on the particular activities carried out through our website or when you visit one of our premises.

This information includes:

| | |
|----------------------|--|
| Identity Data | Your name, title, username, or similar identifier. |
| Image Data | CCTV footage within our premises. |

| | |
|--|--|
| | Vehicle registration number and details (via Automatic Number Plate Recognition (ANPR) systems where it is in operation at our premise car parks). |
| Contact Data | Your address and contact details, including email address and telephone numbers. |
| Privacy Preferences | Details of your preferences about receiving communications from us including marketing communications. |
| Technical Data | Information gathered during your use of our website such as your IP address, the domain name from which you are accessing the server, |
| Marketing and Communications Data | Your marketing and communication preferences. We also track when you receive and read marketing communications from us, which information we use to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials. |
| Profile Data | Information collected progressively when you visit our site including your referral website, pages you visit, actions you take, patterns of page visits and information from forms you fill in. |
| Usage Data | Information about how you use our website. |
| Health Data | Details of any current infectious disease that you may have to ensure there is no contamination at our food production site. |

5.2. We do not collect any financial information on our website.

6. What happens if you do not supply your personal data?

6.1. You are under no statutory or contractual obligation to provide personal data during your use of our website or in your interactions with us. However, if you do not provide us with your personal data, we may not be able to use the website effectively, provide a response or fulfil your online request.

7. Purposes and legal basis for which we will use your personal data

7.1. The table below describes the ways in which we use your personal data and the legal bases we rely on to do so. Where appropriate we have also set out our legitimate interests in processing your personal data.

| Individual | Purpose and/or activity | Type of Data | Legal basis for processing |
|---|--|---|--|
| All website visitors | Personalising and tailoring the website – delivering relevant content to you, to measure or understand the effectiveness of the content we serve to you. | Profile Data | Legitimate Interest – we have a legitimate interest in personalising and tailoring the website to provide users with the best experience. |
| All website visitors | Managing your preferences to receive marketing preferences. | Privacy Preferences | Legal Obligation (Data Protection) |
| All website visitors | Managing and improving our website. | Technical Data | Legitimate Interest – we have a legitimate interest in creating an effective website for the benefit of our users and ultimately to benefit our organisation. |
| All website visitors | Creating user profiles. These are used to help us improve the content, design and performance of our website. | Technical Data Identity Data Contact Data | Legitimate interest – we have a legitimate interest in creating an effective website and to tailor content for the benefit of our users and ultimately to benefit our organisation and provide relevant content to website users. |
| All website visitors, who sign up for marketing | To send you relevant updates about our products and services | Contact Data, Marketing Communications Data | Consent |
| Individuals contacting us with enquiries | To respond to enquiries received from you | Contact Data | Legitimate Interests – we have a legitimate interest to respond to enquiries that are sent to us for the benefit of the individual making the enquiry and to aid our understanding and improvement. |
| Individuals visiting one of our premises | To provide a safe environment at our sites and to maintain footage in the case of legal proceedings | Image Data (CCTV) | Legitimate interests - to provide a safe and secure environment for our visitors and to maintain appropriate records in the event that we need to |

| Individual | Purpose and/or activity | Type of Data | Legal basis for processing |
|---|---|-----------------------------|---|
| | | | commence and manage any legal proceedings |
| Individuals visiting one of our premises | To make a record of any visitors to our site. To allow an awareness of who is on the site at any time in the event of an emergency. | Contact Data Health Data | Legal obligation |
| Individuals visiting one of food production areas | To ensure that any individual entering a food production site does not have an infectious disease that may result in cross contamination. | Contact Data Health Data | Food Safety Act 1990 |
| Individuals visiting one of our premises | To allow for a factual and visual account of those entering the car park | Image Data | Necessary for our legitimate interests to provide a safe and secure environment for our visitors and to maintain appropriate records in the event that we need to commence and manage any legal proceedings |

8. How long will personal data be retained?

- 8.1. We keep personal data that we obtain about you for no longer than is necessary for the purposes for which it is collected. How long we keep your information will depend on the nature of the information concerned and the purposes for which it is processed.

9. Sharing your personal data

- 9.1. The Fresca Group may share your personal data with third-party processors who provide services to us. These services include third parties who provide outsourced operational services to us and the companies within the Fresca Group.
- 9.2. We may share your personal data with organisations where we have a legal obligation, contract or other legitimate interest to do so.
- 9.3. Your personal data may be transferred to other third-party organisations in certain scenarios, for example:
- (a) if we are discussing selling or transferring part or all of our business, personal data may be transferred to prospective purchases under suitable terms as to confidentiality;
 - (b) if we are reorganised or sold, personal data may be transferred to a buyer who can continue to provide services to you;

- (c) if we are required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority, for example the police, we may need to share your personal data; or
- (d) if we are investigating or defending any legal claims your personal data may be transferred as required in connection with defending such investigations and/or claims.

10. Transferring data overseas

- 10.1. In some cases, we may need to transfer personal data outside United Kingdom (**UK**). Where this is the case, we will only share the minimal amount of personal data necessary for the purpose of processing and, where possible, we will share the personal data in an anonymised form.
- 10.2. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - (a) we may transfer your personal data to countries for whom there has been an adequacy by the UK Secretary of State (as applicable) confirming that that country provides an adequate level of protection for personal data;
 - (b) we may use specific contracts approved by the UK Data Protection Laws (as applicable) which give personal data the same protection it has within UK. When we rely on this measure, we will ensure that the third-party can comply with the provision of such contracts and we have confirmed that the country to which the personal data is transferred provides enforceable data subject rights and effective legal remedies for data subjects are available there; or
 - (c) a specific exception applies under applicable data protection law.

11. How we protect your personal data

- 11.1. We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 11.2. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12. Marketing

We would like to send you information about products and services and events which may be of interest to you. Where we have your consent, we may do this by post, email or telephone. We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes. We will ask whether you like us to send you marketing messages when you subscribe to receive our latest news and events on our website. If you have agreed to being contacted in this way, you can unsubscribe at any time by:

- (a) contacting us at dataprotection@frescagroup.co.uk or

- (b) using the 'unsubscribe' link in emails or communications we send to you.

13. Cookies and similar tracking devices

- 13.1. Cookies are small files of letters and numbers stored on your browser or device. These cookies are used to ensure that you are sent the correct content when your computer requests it. Some cookies are essential to enable you to move around our Website and use its features and/or services. For example we will use a cookie to remember your selections as you move through our website.
- 13.2. When you first visit our website, you will be provided with information about the cookies we use and to manage your cookie preferences.
- 13.3. You can also click on [Cookie Policy - Fresca Group](#) to view a current list of our cookies.

14. Your rights

- 14.1. Under data protection laws, you have rights including:
 - (a) **Your right of access** – You have the right to ask us for copies of your personal data.
 - (b) **Your right to rectification** – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.
 - (c) **Your right to erasure** – You have the right to ask us to erase your personal data in certain circumstances.
 - (d) **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances.
 - (e) **Your right to object to processing** – You have the right to object to the processing of your personal data in certain circumstances.
 - (f) **Your right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
 - (g) **Rights related to automated decision making, including profiling** - You have the right not to be subjected to a decision based solely on automated processing (including profiling) which may significantly affect you.
- 14.2. If you wish to exercise any of your rights, please contact us at dataprotection@frescagroup.co.uk. In most cases we will deal with your request as soon as possible and at the latest within one calendar month of the request. If we need to extend the time period for responding to your request, we will let you know within the one-month period. We do not charge a fee for any such requests unless there are exceptional circumstances.

15. Complaints

If you have any concerns about the personal data we use about you, you have the right to make a complaint to us at any time by emailing dataprotection@frescagroup.co.uk. If we cannot deal with your concern to your satisfaction, you have the right to contact the UK regulator, the Information Commission's Officer (**ICO**) by contacting them at www.ico.org.uk.

16. Entities within the Fresca Group

| Entity name | ICO Registration | Website | Registered Address |
|---|------------------|--|--|
| Fresca Group Limited | ZA124424 | www.frescagroup.co.uk | The Fresh Produce Centre Transfesa Road Paddock Wood Kent TN12 6UT |
| The Fresh Produce Centre | ZA458809 | www.thefreshproducecentre.co.uk | The Fresh Produce Centre Transfesa Road Paddock Wood Kent TN12 6UT |
| M&W Mack Limited T/A DGM Growers | Z3266028 | www.dgmgrowers.co.uk | The Fresh Produce Centre Transfesa Road Paddock Wood Kent TN12 6UT |
| M. & W. Mack Limited t/a Mack Wholesale | Z4933191 | www.mwmack.co.uk | Wholesale Fruit Centre, Albert Crescent, Bristol BS2 0YH |
| Fresh Clear | Z4933191 | https://www.freshclear.com/ | The Fresh Produce Centre Transfesa Road Paddock Wood Kent TN12 6UT |
| PrimaFruit | Z7508116 | www.primafruit.co.uk | Enterprise Way Vale Business Park Evesham Worcestershire WR11 1GT |

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| Thanet Earth Limited | Z2228576 | www.thanetearth.com | Barrow Man Road Birchington Kent United Kingdom CT7 0AX |
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