

PRIVACY NOTICE

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This notice was last updated on Friday June 4th, 2021, and complies to the UK GDPR, underpinned by the UK law the Data Protection Act (2018), and regulated by the UK ICO (Information Commissioners Office).

Scope & Responsibilities

Our scope is all data subjects, whose personal data is collected, in line with the requirements of the UK GDPR.

The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to FMCG Academy Ltd collecting and processing their personal data.

All associates and employees of FMCG Academy Ltd who interact with data subjects are responsible for ensuring that this privacy notice is drawn to the data subject's attention and their consent to the processing of their personal data is secured.

Who we are?

FMCG Academy Ltd are the leading source of FMCG Operational Excellence knowledge, which clears up confusion and gets results. Our platform enables you to find out where your factory is on its operational excellence journey, and take the right decisions to get results, increase capacity, efficiency and reduce waste.

FMCG Academy Ltd collects and processes certain personal information about you.

When we do so we are regulated under the [UK General Data Protection Regulation](#), which is underpinned by the [Data Protection Act \(2018\)](#)

We are responsible as the data controller & data processor (UK GDPR Article 30) for all personal information collected for the purposes of those laws. The Data Protection Officer (DPO) is Jeremy Praud of FMCG Academy Ltd, The Stables, Unit 4, Newby Hall, Ripon, North Yorkshire, England, HG4 5AE.

FMCG Academy Ltd can be contacted via email info@fmcgacademy.org

The personal information we collect and use.

Lawful bases for processing of personal data:

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever FMCG Academy Ltd processes your personal data:

- **Contract** - the processing is necessary for FMCG Academy Ltd to fulfil the obligations of an agreement or contract for the provision of our FMCG operational excellence services. Both parties would be provided with a signed copy of the contract and a copy of this privacy notice.
- **Legitimate Interests** - the processing is necessary, as FMCG Academy Ltd has ascertained the legitimate interest of the individual/organisation and explained why the processing of personal data is required to action the legitimate interest. FMCG Academy Ltd reviews our legitimate interest to hold personal data annually via a Legitimate Interests Assessment (LIA).
- **Consent** - the individual has given clear consent for FMCG Academy Ltd to process their personal data for a specific purpose. The individual has the right to object and the right to withdraw consent.

You can find more about the UK GDPR lawful bases [here](#) or by visiting www.ico.org.uk

How we use your personal information

FMCG Academy Ltd uses your personal information:

- To capture new enquiries, including the setting up of an online account, via the FMCG Academy Ltd website, where personal identifiers such as name and email address are required.
- To communicate with you, via email/phone/video call, throughout the duration of any contracted period between FMCG Academy Ltd and the data subject.
- To provide and maintain your online account, which enables the full use of our services.
- To issue financial documentation to you, such as invoices & administer payment processing for our services.
- To notify you about changes to our services through trusted FMCG Academy Ltd communication channels.
- To, from time to time, offer its users email subscriptions or newsletters. Any such communications will always follow an 'opt-in' policy whereby they will not be sent to you unless you have given FMCG Academy Ltd permission in advance to do so.
- To provide additional after sales customer care and support (e.g., follow up calls & meetings).
- To monitor the analysis/usage of the FMCG Academy Ltd website, however this is only in relation to contact form personal data capture, as all other data is 'non-personal data', which is out of the scope of UK GDPR and is analysed via Google Analytics.

What information we collect about you.

The personal data you have provided, or we have collected from you, or we have received from third parties includes:

- contact details (e.g., contact names, email addresses, contact numbers)
- addresses (e.g., business addresses & other nominated addresses)
- financial information relating to invoices, payments, and receipts.
- identifiers assigned to you, your computer, or other devices, including your Internet Protocol (IP) address, which is used for fraud prevention and to improve customer experience.

Who we share your personal information with?

Where relevant, given the nature of the services provided to you by FMCG Academy Ltd we may also share your personal data with the following categories of third parties:

- third party service providers who support the operation of our business, such as IT and marketing suppliers, financial service providers, and debt collection agencies (as is necessary for the performance of a contract between you and us and/or as is necessary in accordance with our legitimate interests).
- fraud prevention agencies and associations, (as is necessary for compliance with our legal obligations).
- National law bodies and third parties, including the police, HM Revenue and Customs or any other relevant authority who may have jurisdiction (as is necessary for compliance with our legal obligations and/or as is necessary in accordance with our legitimate interests)

We would always inform you ahead of acting on any instructions to proceed with any of our services, should this be the case. This data sharing enables FMCG Academy Ltd to supply the above documented services to you in a professional and timely manner, whilst undertaking quality control & regulatory compliance procedures.

Furthermore, it ensures compliance with all necessary UK GDPR & Data Protection Act (2018) lawful requirements. FMCG Academy Ltd will share personal information with law enforcement or other authorities if required by applicable law.

Processing personal data outside of the UK

The personal information that we collect from you may be transferred to and processed in a destination outside of the UK. It may also be processed by staff operating outside the UK who work for one of our nominated data subjects (e.g., clients, suppliers).

In these circumstances, your personal information will only be transferred on one of the following bases:

- the country that we transfer the data to has an 'adequacy agreement' in place with the UK. Meaning, the country where the data is to be sent has provisions for the protection of personal data in line with the requirements set out by the Data Protection Act (2018) and the UK GDPR; or
- the recipient has agreed with us standard contractual clauses (e.g., through data impact assessments and detailed risk assessments) that guarantee the same levels of data protection as set out by the Data Protection Act (2018) and the UK GDPR; or
- there exists another situation where the data transfer is permitted under alternative applicable data protection legislation, that has an agreed standard (adequacy decision) that falls in line with EU GDPR, and in turn there is an adequacy decision between EU GDPR and UK GDPR. One such example would be where a recipient of personal data in California in the United States has registered under the California Consumer Privacy Act and wishes to exchange personal data with a UK based data subject and vice versa.

To find out more about how your personal information is protected when it is transferred outside the UK you can read more here on [International Data Transfers](#), including the relevant safeguards to which FMCG Academy Ltd adheres.

Whether information must be provided by you, and if so, why?

The provision of certain personal data including (but not limited to) contact name and email address is required. This enables FMCG Academy Ltd to set-up your online account and provide our improvement support services to you.

We will inform you at the point of collecting information from you, whether you are required to provide any other additional information to us.

How long your personal information will be kept?

- FMCG Academy Ltd will retain your personal information for several purposes, as is necessary to allow us to carry out our business in accordance with our legitimate interests and / or as is necessary for compliance with our contractual obligations.
- Any retention of personal data will be carried out in compliance with legal and regulatory obligations and with industry standards. These data retention periods are subject to change without further notice because of changes to associated laws or regulations.
- Your personal data and information will be kept for the duration of your active account on our main systems, after which time it will be deleted.
- 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.
- 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.
- Details of retention periods for different aspects of your personal data are available in our Document Destruction & Retention Policy which you can request from us by [contacting us](#).
- Any personal data held in paper copy is securely stored pre-destruction and is destroyed with a Certificate of Destruction in line with our UK GDPR Document Destruction & Retention Policy.

Your rights

Under the UK GDPR, Data Protection Act (2018) and ICO guidance you have several important rights free of charge. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- 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.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the [Information Commissioner's Office \(ICO\) on individuals rights under the UK General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- call, email, or write to us in the first instance.
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates?

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information 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.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator (e.g., ICO) of a suspected data security breach where we are legally required to do so.

If you want detailed information from, Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Cookies

We use cookies to collect, store and share bits of information about your activities when you use our website. Cookies do different things, like letting you navigate between pages quickly and generally improving your experience of a website. If a website does not use cookies, it will think you are a new visitor every time you move to a new page on the website – for example, when you enter your login details and move to another page it will not recognise you and it will not be able to keep you logged in.

FMCG Academy Ltd only use non-personal data essential cookies on this website to track the performance of the website via Google Analytics. This non personal data helps us to understand how to improve the website content for the benefit of all users. If you want to block cookies, then you can do this through your browser via the help function. You can also visit www.aboutcookies.org for further guidance.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data.

The [UK General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioners Office (ICO) who may be contacted [here](#) or by telephone on *0303 123 1113*.

Changes to this privacy notice

This privacy notice was last reviewed and published on Friday June 4th, 2021.

FMCG Academy Ltd is a UK based company, registered in England & Wales, under company registration number 11377114.

We may change this privacy notice from time to time, when we do, we will inform you via email and/or our company website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information, we hold about you.

The Data Protection Officer (DPO) is Jeremy Praud.

If you wish to contact us, please send an email to info@fmcgacademy.org or write to Jeremy Praud at FMCG Academy Ltd., The Stables, Unit 4, Newby Hall, Ripon, North Yorkshire, England, HG4 5AE.