

PRIVACY POLICY – December 2025

Ochil Foods Ltd. ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Director: David Laing

OCHIL FOODS LTD. Unit 2a & 2b Lawgrove Place, Inveralmond Industrial Estate, Perth, PH1 3ED

Registered in Scotland No SC399047 VAT Registration 502 8270 73

Tel: 01764 662502

Ochil Foods Ltd. is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Unit 2a & 2b, Lawgrove Place, Inveralmond Estate, Perth, PH1 3ED. For all data matters contact our data representative David Laing david@ochilfoods.co.uk or on Tel: 01764 662502.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To conduct our regular business operation;
- To maintain our own accounts and records;
- To inform individuals of news, events or activities;

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- ☐ Personal data - The personal data that you give us may include your name, address, e-mail address and phone number, mobile phone number, your purchasing activity, financial information and job or personal description.

5. Our lawful basis for processing your general personal data:

To make our products available to you:

We use your personal data to provide you with the information and services that you request and/or purchase from us (i.e. to complete certain tasks, processes or orders and deliver your products), and to communicate with you regarding those products that you purchase from us and respond to your questions and comments.

We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data when you make an order for products. Alternately we may rely on our legitimate interests as a business (for example to enquire or troubleshoot customer issues). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

For administrative and internal business purposes:

We may use your personal data for internal business purposes such as enhancing our offering, by identifying usage trends. It is in our legitimate interests as a business to use your personal data in this

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way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

For Security and legal reasons:

We may use your personal data to:

- Ensure the personal data and financial information you provide is accurate;
- Conduct fraud checks and prevent illegal activity;
- Protect our rights or property (or those of others);
- Fulfil our legal and compliance-related obligations.

In some cases we will use your personal data because it is necessary for us to comply with a legal obligation (such as if we receive a legitimate interest request from a law enforcement agency). In other cases (such as the detection of fraud) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interest, we will always make sure that we balance these interests against your rights.

To keep you up to date with our products and services

We may decide from time to time to contact you to let you know about products, and in most cases our legal basis for doing this is as a legitimate business interest. So that we are sure that you would like to hear from us, we may ask you for your consent to contact you in this way. There is no obligation to give us your consent, and your lack of consent would not infringe in our ability to transact with you.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with our trusted third parties, as detailed below.

Third Party service providers

We work with a number of delivery service providers who will deliver products on our behalf. It is in our legitimate interests as a business that we work with these service providers since we may not have the capabilities to provide these services ourselves. In each case, we will ensure that the service provider is only allowed to use your personal data to provide the services to us and for no other purpose.

To prevent crime and comply with laws

We may share your financial information (such as your credit terms and balances due to us) with our financial providers or banks in the running of our accounts. We may share your personal data with credit agencies if you are requesting credit. We may be asked by another business in our trade to supply a trade reference, which may involve the disclosure of personal information ie. your credit terms with us. It is in our legitimate interests as a business to share such information with other businesses

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within our sector. Where we rely on our legitimate interest, we will always make sure that we balance these interests against your rights.

There may be other scenarios where we are subject to a legal obligation to share or disclose your personal data, such as with law enforcement agencies or public authorities in order to prevent or detect crime or fulfil a legal requirement.

7. How long do we keep your personal data?

In broad terms, we will only retain your personal data for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of data and the reason we have the data in the first place.

We have procedures in place regarding our retention periods which we keep under review taking into account our reasons for processing your personal data and the legal basis for doing so.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority)); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

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WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will, where appropriate, be notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative David Laing david@ochilfoods.co.uk or on Tel: 01764 662502.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231115 or via email [Information Commissioner's Office - Scotland](#) or at the Information Commissioner's Office - Scotland 45 Melville Street, Edinburgh, EH3 7HL

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