



Last updated – January 2023

Joules Privacy Statement for Suppliers

Who are we?

We are The Harborough Hare Limited (“**Joules**”), a company registered in England and Wales under company number 14504304 and with our registered office at Desford Road, Enderby, Leicester, UK, LE19 4AT.

What is the purpose of this statement?

For the purpose of this statement, “**suppliers**” shall include third party organisations (e.g. corporate entities) and individuals (e.g. sole traders, contractors and freelancers) providing a product and/or a service to Joules.

Under applicable data protection legislation, we are required to explain to our suppliers why we collect personal information related to them or their employees, what type of information we collect, how we intend to use that information and whether we will share that information with anyone else.

It is important that you read this statement so that you know how and why we use personal information related to you or your employees. It is also important that you inform us of any changes to any personal information during your working relationship with us, so that the information we hold is accurate and current.

What type of personal information do we have?

We currently collect and process the following personal information related to our key contacts at our suppliers:

- Full name
- Email addresses, phone numbers and postal addresses
- Job title, functional area/department and job location
- Where we pay you personally (e.g. individuals) your bank details

How do we get this personal information and what do we do with it?

You give the personal information to us as part of the onboarding process or as the commercial relationship evolves, and we process the information for one of the following reasons:

- a) In order to fulfil the contract entered into with our suppliers (e.g. to manage the commercial arrangement and process payments).



- b) Pursuant to our legitimate commercial interests as an organisation to be able to manage our working relationships with our suppliers (e.g. to deal with a dispute or a claim and to manage suppliers in a more efficient way).
- c) In order to fulfil our legal obligations (e.g. in the event we have to disclose supplier contact details to a legal or regulatory body as required by law).

Under the UK GDPR (as defined in section 3 of the Data Protection Act 2018), the lawful bases we rely on for processing this information are:

- (a) We have a contractual obligation.
- (b) We have a legitimate interest.
- (c) We have a legal obligation.

We may share the personal information with a Joules subsidiary if necessary, which may involve sharing the information internationally to entities based in Europe and the USA.

We have put in place appropriate measures to ensure that your personal information is handled by our subsidiaries in a way that is consistent with, and which respects, all applicable data protection laws. These measures may involve putting in place standard data protection clauses, for example template transfer clauses adopted by the European Commission and/or the Information Commissioner's Office.

How do we store the personal information?

The personal information is stored securely in our systems. We are required to adopt appropriate security measures to protect all personal information, in order to prevent the information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to the personal information to those employees who have a business need to know, and they are subject to a duty of confidentiality. We will also only retain the personal information for as long as necessary to fulfil the purpose(s) we collected it for.

What data protection rights does an individual have?

Under data protection law, an individual has certain rights including:

Right of access – The right to ask us for copies of any personal information we hold about them.

Right to rectification – The right to ask us to rectify information which is inaccurate.

Right to erasure – The right to ask us to erase personal information in certain circumstances.

Please contact the Joules Compliance Team at joulescompliance@joules.com if you wish to make a request.

How can you complain?



You can complain to the ICO if you are unhappy with how we have used any personal information.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

Changes to this privacy statement

We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any material updates. We may also notify you in other ways from time to time about the processing of any personal information.

Joules Compliance Team

The Joules Compliance team is responsible for monitoring our compliance with data protection laws. If you have questions about any aspect of this privacy statement, you can contact the Compliance team by writing to joulescompliance@joules.com.