Privacy Policy

Lancashire Eccles Cakes Limited · Version 4 · 4 November 2026

1 WHO WE ARE

We are Lancashire Eccles Cakes Limited, a company incorporated in England and Wales (company number: 01398525), whose registered office is at 57 Hyde Road, Ardwick, Manchester M12 6BH (the "Company" or "we" or "us").

The Company and personal data: We are committed to lawful, fair and transparent processing of all personal data about our employees, customers, suppliers and other third parties during the course of our business activities. We will always comply with any applicable data protection legislation and we will ensure that collection and use of personal data is carried out in accordance with applicable data protection laws. The main laws governing data protection in the UK are the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018.

What this policy is: This policy (and any other documents referred to in it, together with any privacy notice displayed on our website) sets out the basis on which we will process any personal data about you or individuals generally – whether it's information we collect from those individuals or that is provided to us from other sources. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer or store personal data.

Notification: We comply with current requirements to notify our data processing activities to the Information Commissioner's Office and are registered under number Z6748854.

Controlling and processing information: We are the controller of all personal data used in our business for our own commercial purposes. Sometimes though, we may process personal data on behalf of another data controller – and when this is the case, we will do so only in accordance with the instructions of that data controller and otherwise in accordance with the law.

Why you should read this policy: It is important that you read this policy, together with any other documents referred to in it, so that you are aware of how any personal data relating to you will be dealt with by us.

2 DATA PROTECTION PRINCIPLES

We are accountable for demonstrating compliance with the UK GDPR's six principles of processing personal data. These provide that personal data we deal with must be:

(a) processed fairly, lawfully and in a transparent manner;

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

(c) adequate, relevant and limited to what is necessary;

(d) accurate and, where necessary, kept up to date;

(e) not kept for longer than necessary; and

(f) processed securely, maintaining integrity and confidentiality.

3 SOME BASIC DEFINITIONS WE USE IN THIS POLICY

Personal data: In this policy, when we use the term "personal data" we mean any information relating to an identified or identifiable human being. (An "identifiable natural person" is one who can be identified, directly or indirectly, for example, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, biometric, mental, economic, cultural or social identity of that person).

Sensitive personal data: In this policy, when we use the term "sensitive personal data" we mean special categories of information which are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning someone's sex life or sexual orientation.

4 THE KIND OF PERSONAL DATA WE HOLD ABOUT YOU

We may collect, record, organise, structure, store, adapt, alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destroy the following types of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Demographic information such as your postcode
- Information relevant to customer surveys and/or offers
- Date of birth
- Gender
- Information about your use of our information and communications systems
- Any information you make available, or transmit to us, via social media accounts
- Details of transactions you may carry out through our website or by other means, the fulfilment of your instructions and any subsequent communications with you about any of these.
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own administrative purposes or otherwise and the resources that you access.
- We may record telephone conversations for training and security purposes. You will be notified if recording is taking place at the commencement of any call.
- Closed circuit television recordings within our premises for safety and security purposes.

We do not collect, store or use sensitive personal data.

5 HOW IS YOUR PERSONAL DATA COLLECTED?

In the course of our business, we may collect personal data directly from an individual:

- when you provide information in relation to the purchase of goods;
- when you submit an enquiry about our goods or services;
- when you sign up to our mailing list; and
- when you provide personal data directly to members of our team.

We will only collect personal data to the extent that it is required for the specific purpose notified to individuals about whom we are collecting it – and we will keep it only as long as is necessary.

6 HOW WE WILL USE PERSONAL DATA

We will only use personal data when the law allows us to do so and relying on a relevant basis for lawful processing in each instance. We will use your personal data in the following circumstances, relying on the basis of processing indicated:

Basis of processing: Where we need to perform a contract we are about to enter into or have entered into with you.

- To provide you with information, products or services that you request from us (contact details).
- To carry out our obligations arising from any contracts entered into between you and us (contact details, payment information and any information relating to personalisation status).

Basis of processing: Where it is necessary for our legitimate interests (or those of a third party) and we have undertaken an assessment to determine that processing for those interests (listed below) does not outweigh your interests and fundamental rights, considering the nature and impact of the processing and any relevant safeguards we can put in place.

- To ensure that content from our website is presented in the most effective manner for you and for your device (online identifiers, location data and other technical information).
- To provide you with information, products or services that we feel may interest you, (where you have consented to be contacted for such purposes to the extent consent is required by law) (contact details and any information relating to personalisation preferences).
- To allow you to participate in interactive features of our service, when you choose to do so (online identifiers, location data and other technical information).
- To notify you about changes to our service (contact details).
- To maintain a basic amount of information about you and your transaction history, in order to provide you with a service tailored to your preferences (contact details, payment history and any information relating to personalisation status).

Basis of processing: Where we need to comply with a legal or regulatory obligation.

- To retain basic transaction details for the purpose of tax reporting (contact details and transaction history).

Basis of processing: Where you have consented to the processing.

- To use non-essential cookies on our website (see “Cookies” section below for further information) (online identifiers, location data and other technical information). You have the right to withdraw consent to such use at any time by contacting us but please note that some or all parts of our website may no longer be accessible to you.
- To send you direct marketing communications via email, text message, post or telephone call (contact details). You have the right to withdraw consent to any such use at any time by contacting us.

Other issues about how we use personal data:

1) Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact our Compliance Officer if you need details about the specific legal basis we are relying on to process your personal data – contact details are below.

2) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact us if you would like further details of any additional purposes of processing. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

3) Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). If this happens, we may have to cancel, or be unable to provide, any services you have requested.

4) Please note that we may process your personal data without your knowledge or consent where required or permitted by law.

5) We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered “personal data” in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your website usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

6) If you provide us with any personal data relating to colleagues, relatives or other individuals it is your duty to make such persons aware that their personal data may be shared with us and to provide them with appropriate

information about how their personal data may be processed by us.

7 DIRECT MARKETING

As indicated above, we may use your personal data to provide you with information about goods and services which may be of interest to you and we may contact you about these by email, text message, post or telephone call. This is known as direct marketing.

Examples of direct marketing may include:

- sending promotional emails about new products, special offers, customer events or other information which we think you may find useful or interesting using the email address which you have provided;
- contacting you for market research purposes (by email, text message, post or telephone call).

We will only process personal data for the above purposes as permitted by law, which usually means with your specific consent. You have the right to withdraw this consent at any time. Information about how to withdraw your consent is set out below.

We do not disclose your information to any third parties for the purpose of direct marketing.

8 CONSENT

In this policy, where we have referred to needing your consent for any processing, we will make sure that the consent:

- is specific consent for one or more specified purposes; and
- is given by a clear affirmative action establishing a freely given, specific, informed and unambiguous indication of your agreement to the relevant processing of personal data.

9 AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal data to make a decision relevant to you without human intervention. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

10 DATA SHARING

Transfer of personal data outside of the UK: We may transfer certain personal data that we hold on individuals living in the UK to a country outside the UK, provided that one of the following conditions applies:

- the country to which the personal data is transferred ensures an adequate level of protection for that individual's rights and freedoms;
- an individual has given their explicit and informed consent having had the risks explained to them;
- the transfer is covered by one of the derogations set out in law, including the performance of a contract between us and that individual, or to protect the vital interests of individuals;
- the transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims; or
- the transfer is authorised by the relevant data protection authority where we have checked adequate safeguards exist with respect to the protection of the individual's privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements set out above, the personal data we hold may also be processed by individuals operating outside the UK who work for us or for one of our suppliers. Those individuals may be engaged in, among other things, the fulfilment of contracts with the relevant individual, the processing of payment details and the provision of support services.

Safeguards: If we use a third party data processor to process personal data on our behalf, we will obtain contractual commitments to safeguard the security of the personal data to ensure that the third party only acts

on our instructions when using that personal data and that the third party has in place appropriate technical and organisational security measures to safeguard the personal data. 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:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Where we use service providers, we may use specific contracts approved by the UK government which give personal data the same protection it has in the UK. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the UK.

Why we might share your personal data with third parties: We may share personal data we hold with: (i) any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries; and/or (ii) in the event that we sell or buy any business or assets, or sell the Company, we will disclose your personal data to the prospective seller or buyer of such business or assets. We may also disclose personal data we hold to third parties if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with that individual or other agreements; or to protect our rights, property or safety of our employees, customers or others. This includes exchanging personal data with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share personal data with other members in the group as part of our regular reporting activities on company performance, such as analysis of website usage. Where appropriate, we will anonymise personal data when used for performance reviewing and reporting activities.

We may also share personal data we hold with selected third parties for the purposes set out below. We do not allow our third party service providers to use your personal data for their own purposes; we only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third party service providers who may process your personal data: When we use the term "third party", we mean any entity who is not the Company, including third party service providers, contractors and designated agents and any member of our group. The following third party service providers may process personal data for the following purposes:

- Valetech Solutions Limited, who provide IT support
- Marsh Limited, our insurance brokers
- ManyChat, Inc. (USA) – automated replies to comments and direct messages on our Facebook and Instagram pages
- Google Ireland Limited and Google LLC (reCAPTCHA) – protecting our contact form against spam and automated abuse

11 DATA SECURITY

We will always take appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing (including taking reasonable steps to ensure the reliability of employees who have access to personal data). Our employees may only process personal data in accordance with this privacy policy, and any employee who breaches this privacy policy may be subject to disciplinary action, up to and including dismissal.

We have put in place internal procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12 DATA RETENTION

We will not keep personal data in a form which permits identification of individuals for longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. 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 personal data, the purposes for which we process information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will only keep personal data for as long as is necessary for the purpose or purposes for which that personal data is processed; and we will let anyone about whom we process data know how long that is or the criteria that go into deciding how long that is.

We may sometimes anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the security of these websites. Please check the relevant policy before you submit any personal data to these websites.

13 YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as summarised below.

You have the right to:

1. Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

4. Object to processing of your personal data where we are relying on a legitimate interest (of our own or of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

6. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

7. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Compliance Officer as detailed below. We aim to respond to all legitimate requests within one month (and if we are only processing the data in question on behalf of another party, the response may actually come from that other party as the relevant data controller). Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive – alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

14 OUR WEBSITE AND COOKIES

Contact form. If you use the contact form on our website, we collect your name, email address and message and, if you choose to give it, your telephone number. We use this information only to respond to your enquiry. Our legal basis is our legitimate interest in answering enquiries from customers, retailers and the public. Your enquiry is sent by email to our sales team. A copy is also stored securely on our website, so that no enquiry is lost if an email is not delivered. These stored copies are deleted automatically after 12 months. Emails about your enquiry are kept only for as long as needed to deal with it and any follow-up.

Spam protection (Google reCAPTCHA). To protect our contact form against spam and automated abuse, we use Google reCAPTCHA, a service provided by Google Ireland Limited and Google LLC. reCAPTCHA runs in the background on our contact page and checks whether the form is being filled in by a person or by an automated program. For this, Google processes information such as your IP address, details about your browser and device, how you interact with the page, and cookies already set by Google. This information is used only to tell people and automated programs apart. Google may process this data on servers outside the UK, including in the United States; such transfers are protected by appropriate safeguards. Google's Privacy Policy and Terms of Service apply.

Legal basis: our legitimate interest in protecting our contact form and our team against spam and abuse (Art. 6(1)(f) UK GDPR).

Hosting. Our website is hosted by an external hosting provider, who processes data on our behalf. When you visit the site, the server automatically records technical information such as your IP address, browser type and the pages you visit. This is needed to deliver the website securely and is deleted after a short period.

Website security. To protect our website against attacks, we use security software. If someone repeatedly fails to log in to the administration area of our website or shows other signs of an attack, their IP address is recorded and may be blocked temporarily. This information is used only to keep our website secure and is deleted automatically after a limited period. Our legal basis is our legitimate interest in keeping our website and the data on it secure.

Instagram. Our website shows images from our Instagram account. These images are stored on our own website and link to our Instagram page. No data is sent to Instagram (Meta Platforms Ireland Limited) when you view them. Only if you click on an image will you be taken to Instagram, which has its own privacy policy.

Videos. Videos on our website are provided by YouTube (Google) and Vimeo and only load when you hover over or click them. YouTube videos are shown in privacy-enhanced mode and Vimeo videos with "do not track" enabled. When a video plays, the provider may process your data in line with its own privacy policy.

Links to social media. Our website links to our Facebook and Instagram pages. These websites have their own privacy policies.

Automated messages on Facebook and Instagram. When you comment on one of our Facebook or Instagram posts with a keyword we have announced (for example “HUNT”), we may send you an automatic reply in public and a direct message via Messenger or Instagram. For this we use ManyChat, a service provided by ManyChat, Inc., USA. ManyChat processes your public profile name, profile ID, your comment and the messages exchanged with us, only on our behalf and only to send you the information you asked for. Your data may be transferred to the USA; ManyChat has committed to appropriate safeguards for such transfers under a data processing agreement. You can stop the messages at any time by replying “STOP”. We keep the contact data held in ManyChat for as long as we stay in contact with you on Facebook or Instagram, in line with section 12 “Data retention”. You can ask us to delete it at any time (see section 13 “Your rights”). Meta’s own privacy policy also applies to your use of Facebook and Instagram.

Legal basis: our legitimate interest in answering your request (Art. 6(1)(f) UK GDPR).

Google Analytics. We use Google Analytics, a service provided by Google Ireland Limited and Google LLC, to understand how visitors use our website – for example which pages are visited and for how long – so that we can improve it. Google Analytics uses cookies and collects information such as the pages you view, the type of device and browser you use and your approximate location. Google Analytics does not store your full IP address. We do not use Google Analytics for advertising, and Google’s advertising features and data sharing are switched off. Our legal basis is our legitimate interest in improving our website. Google may process this data on servers outside the UK, including in the United States; such transfers are protected by appropriate safeguards. Analytics data is kept for a maximum of 14 months. You can opt out of Google Analytics at any time, as explained in our Cookies Policy.

Cookies. We keep the use of cookies to a minimum and do not use cookies for advertising. Full details are set out in our Cookies Policy.

15 COMPLIANCE OFFICER

The person responsible for how the Company deals with personal data, our Compliance Officer, is responsible for ensuring compliance with the law and with this policy. The post of Compliance Officer is held by Ken Edmonds, who can be contacted at ken@lancashireecclescakes.co.uk. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Compliance Officer.

16 CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify individuals of those changes by email or pop-up notification on our website. Each time you enter or use our website, you agree that the privacy policy current at that time shall apply to all information we hold about you.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

17 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our Compliance Officer (see above).

You have the right to make a complaint at any time to the Information Commissioner’s Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner’s Office, so please contact us in the first instance.