



## Privacy Notice

### Customer Contact Centre

This Privacy Notice explains what happens to the personal information that we collect from you whenever you get in touch with our Customer Contact Centre, whether via our website ([www.greggs.co.uk/contact](http://www.greggs.co.uk/contact)), our "Greggs Rewards" app or by email, telephone, or post.

We may update this Privacy Notice from time to time so please check with us occasionally to ensure that you're happy with any changes.

Please take time to read this Privacy Notice carefully so you understand how we treat and use your personal information.

#### **Who are we?**

We are Greggs plc, one of the UK's leading food-on-the-go retailers ("**we**" or "**us**"). Greggs plc is registered at Companies House under company number 00502851 and our registered office is at Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU.

We are also registered with the Information Commissioner's Office under registration number Z7225689.

If you have a question regarding how we use your personal information, please address your communication to the "Data Protection Representative" using one of the methods set out in the "*How can you find out about and update your information?*" section of this Privacy Notice.

We take data protection very seriously and respect the privacy of our customers. We are committed to protecting and respecting your privacy, in accordance with the General Data Protection Regulation ("**GDPR**").

#### **What information do we collect from you?**

Whenever you contact us to provide feedback on our products or your experiences in our shops, we may collect the following personal information from you:

- Your full name;
- Your contact telephone number;
- Your email address;
- Your contact postal address (where you contact us by post or where we need to send something to you in the post);
- Your IP address (i.e. your unique address that identifies your device on the internet) where you contact us via our website or our Greggs Rewards app.

#### **How is your information held?**



Once collected, we input your personal information onto our Customer Contact database, which is held on our own secure systems within the United Kingdom.

When you contact us via telephone, you will be notified that that your call will be recorded. This recording is held on our Avaya system, which is also held on our own secure systems within the United Kingdom.

**How will we use your information?**

GDPR says that we are allowed to use personal information only if we have a proper reason to do so which may be:

- To fulfil a contract we have with you; or
- When it is our legal duty; or
- When it is in our legitimate interests; or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interests, we will tell you what that is.

We may use your personal information for the reasons and in accordance with the legal basis below:

Purpose of Processing Your Personal Information	Legal Basis
<p>To help us to investigate any complaints, comments or issues that you have raised with us.</p> <p>In doing so, we may share your personal information with colleagues if it is strictly necessary to enable us to carry out our investigations or otherwise where we have received your express consent to do so.</p>	<p>This is either (depending on the circumstances):</p> <ul style="list-style-type: none"> <li>➤ Necessary for the performance of a contract to which you are a party. For example, if your contact relates to an issue with the operation of your Greggs Rewards account that needs to be resolved by us. Processing is necessary so that we can investigate the issue and ensure that we have properly provided our services to you; or</li> <li>➤ Necessary for our legitimate interests to ensure that our customers receive an appropriate level of service and to investigate and resolve the reasons why that may not be the case; or</li> <li>➤ On the basis of consent, specifically where we ask for your consent to be able to use your data for a specific purpose. For example, where your contact relates to a specific shop, we may ask your permission to pass your details onto the relevant Area Manager so that they can speak with you personally.</li> </ul>
<p>To contact you to discuss your complaint and to update you on how it is being resolved</p>	<p>This is either (depending on the circumstances):</p> <ul style="list-style-type: none"> <li>➤ Necessary for the performance of a contract to which you are a party, for example if your</li> </ul>

	<p>contact relates to the operation of your Greggs Rewards account. Processing is necessary so that we can investigate the issue and ensure that we have properly provided our services to you; or</p> <ul style="list-style-type: none"> <li>➤ Necessary for our legitimate interests to ensure that our customers receive an appropriate level of service and to investigate and resolve the reasons why that may not be the case.</li> </ul>
<p>To send gift vouchers or voucher codes to you</p>	<p>This is either (depending on the circumstances):</p> <ul style="list-style-type: none"> <li>➤ Necessary for the performance of a contract to which you are a party, for example if your contact relates to the operation of your Greggs Rewards account. Processing is necessary so that we resolve the issue and ensure that we have properly provided our services to you; or</li> <li>➤ Necessary for our legitimate interests to ensure that our customers receive an appropriate level of service and to investigate and resolve the reasons why that may not be the case; or</li> <li>➤ On the basis of consent, specifically where we ask your consent to be able to use your data to send gift vouchers or voucher codes to you.</li> </ul>
<p>To create and maintain a record to identify where you have been in touch with us in the past, including the reason for that previous contact and how it was resolved</p>	<p>This is necessary for our legitimate interests in order to ensure that we have a good record of customer contacts so that we can:</p> <ul style="list-style-type: none"> <li>➤ monitor complaints regarding our business and any on-going or recurring issues that you may have. This will help us to make sure you receive proper assistance when you contact us and where relevant, that we understand the background to any issues you may have; and</li> <li>➤ identify any potentially fraudulent complaints or series of complaints; and</li> <li>➤ review and assess the quality of our responses to complaints for training and development purposes.</li> </ul>

We also need to compile reports detailing the number and nature of customer contacts received within certain periods of time, which we will share with our colleagues for management purposes. We use reasonable efforts to remove all personal information from these reports, but sometimes (for example,



where personal information is contained in the message box of the “Write to Us” section on our website), it may not be practical for this personal information to be removed or anonymised.

### **How long will we hold your information for?**

We will hold your personal information for a period of 12 months from the date of your contact or if you contact us again within that period of time, for a period of 12 months from the date of your last contact with us.

We will hold your personal information for this length of time because:

- It will help us to handle your contact and provide context and background for any future contacts that we may have within this period of time;
- It will help us to identify any trends in the nature of your contacts with us and customer contacts generally;
- It will help us for training and development purposes, so that we can review and assess the quality of our responses to complaints over the previous 12-month period.

After the expiry of this period, your contact file will be anonymised so that your personal information is removed but so that we can still retain general information about the date and nature of your contact(s) for the purposes of measuring the performance of our business.

We will from time to time review our retention periods but we will only ever hold your personal information on our Customer Contact database for as long as we believe is necessary for reasons set out above.

### **Only processing the personal information that we need to**

Your personal information will only be processed to the extent that it is necessary for the specific purposes we tell you about.

### **Who has access to your information?**

We reserve the right to pass any or all of your personal information to the police or any other law enforcement agency for the purposes of:

- Compliance with any of our legal obligations;
- Crime detection or prevention;
- Your misuse, or suspected misuse, of our website or Greggs Rewards app.

Where your contact relates to any legal proceedings or prospective legal proceedings against us, we may need to pass your personal information onto our insurers and legal advisers for the purposes of assessing any such proceedings. We may also be required to share your personal information if we are under a duty to do so in order to comply with any legal obligation or to protect our rights, property or the safety of our business, customers, suppliers or employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We will also share your personal information with the following categories of third parties:



- Where your contact comes via our Greggs Rewards app, your personal information will need to be passed onto our third party suppliers that support the operation of the app. However, we will only share personal information that is necessary for the operation and functioning of your account;
- Where you need to send something to us (for example, a sample of a product you have purchased from us) or where we need to send something to you (for example a gift), your personal information may need to be passed onto our third party suppliers to help us to achieve this.

Apart from the circumstances set out above, we will not disclose your personal information to any third parties without your consent, unless we are satisfied that they are legally entitled to the information. Where we disclose your personal information to a third party, we will have regard to the data protection principles.

We will not:

- Sell your personal information to third parties; or
- Share your personal information with third parties, or use it ourselves, for marketing purposes (unless you have given your consent for us to do so).

#### **How can you find out about and update your information?**

You have the right to ask for a copy of the personal information that we hold about you. You also have the right to ask that we delete your personal information from our Customer Contact database, although in some circumstances we are still entitled to keep it.

If you wish to do so, please contact us:

- By email at [dataprotection@greggs.co.uk](mailto:dataprotection@greggs.co.uk);
- By post for the attention of the Data Protection Representative, Greggs plc, Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU.

In order to fulfil your request, we may need to first verify your identity.

Any questions regarding this Privacy Notice can be sent to us using the same contact details above.

The accuracy of your information is also important to us. If you change contact details or if you believe that any of the other personal information we hold is inaccurate, incomplete or out of date, please contact us:

- Via the "Write to Us" section at [www.greggs.co.uk/contact](http://www.greggs.co.uk/contact);
- By post for the attention of the Customer Contact Centre, Greggs plc, Greggs House, Quorum Business Park, Newcastle upon Tyne, NE12 8BU;
- By telephone on 0808 147 3447 and ask to speak with our Customer Contact Centre.

In addition to your rights set out elsewhere in this Privacy Notice, you also have the right to:

- Request details from us of the recipients of your personal information or the categories of recipients of your personal information, if it is supplied by us to any third parties;
- In certain circumstances have the processing of your personal information restricted;



- In certain circumstances be provided with the personal information that you have supplied to us, in a portable format that can be transmitted to another company;
- In certain circumstances not to be subject to a decision that is based solely on automated processing which would have a legal or significant impact on you.

If you wish to exercise any of the rights set out above, you must make the request in writing addressed to the "Data Protection Representative" using one of the methods set out in the "How can you find out about and update your information?" section of this Privacy Notice.

### **Withdrawal of consent**

If you have provided your consent for us to process your personal information, you have the right to withdraw your consent at any time. This will not affect the legality of our consent based use before you withdrew your consent.

If you wish to exercise your right to withdraw your consent, you must make the request in writing addressed to the "Data Protection Representative" using one of the methods set out in the "How can you find out about and update your information?" section of this Privacy Notice.

### **The right to object**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the "right to be forgotten".

There may be legal or other reasons why we need to keep or use your information, but please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your personal information. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

If you object to our processing of any of your personal information, you must make the request in writing addressed to the "Data Protection Representative" using one of the methods set out in the "How can you find out about and update your information?" section of this Privacy Notice.

### **How we keep your data secure**

We use reasonable and up to date security methods to keep your data secure and to prevent unauthorised or unlawful access to your information. All personal information you provide to us is stored on ours or our third party supplier's secure systems.

### **Transferring your personal information outside the European Economic Area ("EEA")**

We will not transfer your personal information outside the EEA unless such transfer is compliant with GDPR. This means that we cannot transfer any of your personal information outside the EEA unless:

- The EU Commission has decided that another country or international organisation ensures an adequate level of protection for your personal information; or



- The transfer of your personal information is subject to appropriate safeguards; or
- One of the derogations in GDPR applies (including if you explicitly consent to the proposed transfer).

### **Right to make a complaint**

If you have any issues with our processing of your personal information and would like to make a complaint, you may contact the Information Commissioner's Office on 0303 123 1113 or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.