

## Privacy Statement for Healthy Pleasure Group Limited

Healthy Pleasure Group Limited understands that your privacy is important to you and that you care about how your personal data is used and shared. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

This Privacy Notice ("Notice") informs you of the types of information Healthy Pleasure Group Limited ("Healthy Pleasure," "we," "us," "our," or the "Company") collects about you when you visit our website at [www.amboystreetventures.com](http://www.amboystreetventures.com) and how we use that information.

### INFORMATION ABOUT US

The data controller for all information that we collect is: Healthy Pleasure Group Limited, Hampton Dene House, Hampton Dene Road, Hereford, HR11UX. Our Data Protection Officer can be contacted by email at [compliance@wearehpg.com](mailto:compliance@wearehpg.com) or by contacting the nearest Healthy Pleasure Group Limited office to you. The company also intends to comply with all privacy regulations that apply in the territories in which the company operates.

### SECTION 1: SUMMARY OUTLINE

We keep the information we hold about you to a minimum.

We use your data to respond to your enquiries, provide our services to you, manage our relationship with you, meet our legal obligations and improve our website.

We delete your data when it's no longer required for those purposes.

Your data is not provided to third parties except when stated otherwise.

The company regularly reviews the legal basis of processing.

### SECTION 2: WHAT DATA DO WE HOLD AND HOW DO WE COLLECT IT?

As a client we will hold the following information about you:

Your name, identity and contact information

Information about your business & role

Information & documents relating to any services we provide to you

Communications held between you & us - this is typically in the form of emails and instant messages, but may be in other forms as well. We do not record phone calls.

As a prospective client we will hold:

Your name, identity and contact information

Information about your business & role

Communications held between you & us - this is typically in the form of emails and instant messages, but may be in other forms as well. We do not record phone calls.

As a supplier we will hold:

Your name, identity and contact information

Information about your business & role

Communications held between you & us - this is typically in the form of emails and instant messages, but may be in other forms as well. We do not record phone calls.

As a prospective employee we will hold:

We will process personal data of employment applicants when you apply for a position with Healthy Pleasure Group.

This includes; Name, Home Address, Contact Telephone Numbers, Email Address, Education and Employment History. Personal data will also be processed when you attend an interview and as part of the selection process.

In addition, your details will be held on file for administrative purposes such as, if a suitable position becomes available in the next 12 months should you be unsuccessful within your initial application.

#### USE OF COOKIES

When browsing on our website (as you are now), we deploy the use of cookies to enhance your user experience and to track visitor activity. Please refer to our cookie policy.

#### SECTION 3: HOW DO WE USE YOUR INFORMATION?

What legal basis we have for collecting and using your personal data?

Where relevant under General Data Protection Regulation 2016/679 and other applicable laws, the use of your personal data will be justified by at least one condition for processing. In the majority of cases this condition will be that:

Our use of your personal data is in our legitimate business interest as a commercial organisation, provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights;

Our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you (e.g. to manage your account);

Consent (where we obtain this as the basis for our processing - for example for certain forms of electronic marketing); and/or

Our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we have.

#### PROVIDING MARKETING SERVICES

Upon starting communications with Healthy Pleasure Group Limited, we may research your company to get a deeper understanding about your products & services. This will enable us to understand the best solutions we can prescribe to your business.

This may include us reviewing aspects of your business including your website, social media feed, product catalogue and any other publicly accessible information.

#### DEALING WITH ENQUIRIES

If you make an enquiry with Healthy Pleasure Group (this could be via email, telephone, social media, etc), one of our team will respond to your enquiry. All communications are recorded, except telephone calls.

This is to allow us to create relevant documentation, as well as being able to monitor delivery of our service and ensure we are offering the best service possible. Records of all enquiries are kept for subsequent follow-up and internal record keeping relating to business activity.

#### SECTION 4: INTERNATIONAL TRANSFERS

Healthy Pleasure Group Limited offices are located throughout the world.

Personal data that you provide to us in the normal course of business is not transferred outside the EU. In the event that your business would benefit from a service that is located outside the EU, we will request your authorisation beforehand and provide information on the appropriate lawful basis for data transfer.

If an international transfer of data is required, your personal data may be sent to countries which have different levels of data protection laws than your country of residence. We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

We will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

Transfers between Healthy Pleasure Group Limited and its Affiliates will be covered by intra-group data transfer agreements which give specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred.

Transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances, such as certification schemes such as EU - US Privacy Shield Framework or with the use of Standard Contractual Clauses.

We may also make other disclosures of your personal data overseas, for example, if we receive a legal or regulatory request from a foreign law enforcement body. Any requests for information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed.

Healthy Pleasure Group Limited (UK) complies with all applicable laws before transferring personal data to a recipient in a country with data protection laws that do not have a data protection standard equivalent to the laws where you live.

#### SECTION 5: WHAT ARE YOUR RIGHTS?

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights free of charge in relation to your personal data.

To access a copy of your personal data

To rectify/erase personal data

To restrict the processing of your personal data

To withdraw consent for processing personal data

To transfer your personal data

To object to the processing of personal data

To object to how we use your personal data for direct marketing purposes

To obtain a copy of safeguards used for transfers outside your jurisdiction

To lodge a complaint with your local supervisory authority

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you. We reserve the right to charge a fee where permitted by law, for instance, if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Our email for privacy related queries is [compliance@wearehpg.com](mailto:compliance@wearehpg.com) We will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

#### SECTION 6: THIRD PARTIES

As a general principle, we will not transfer your personal data to third parties without your permission, unless you have purchased a product or service from us which is provided by a third party.

There may be legitimate or legal reasons that we may have to pass your information to a third party for other reasons, such as:

We have partners who provide services to us, who may be able to see small amounts of information. For example, our telephone provider could see what phone numbers we've dialled for billing purposes.

If we receive a court order to disclose your information, we may be forced to do so. Where possible, we would notify you of this we would hand over any data.

If you are delinquent on any invoices, we may choose to use a third-party debt collection agency to help us recover funds owed. This is a worst-case scenario but we do reserve the right to do this.

#### SECTION 7: RETENTION OF YOUR PERSONAL DATA

We will retain your personal data for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances, it may be retained for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

In specific circumstances, we may retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

#### SECTION 8: HOW WE PROTECT AND STORE YOUR INFORMATION

We take the security of the information we collect seriously. We have implemented and we maintain technical and organisational security measures, policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the data concerned. Some of the steps we take are: placing confidentiality requirements on our staff members and service providers; destroying or permanently anonymising personal data if it is no longer needed for the purposes for which it was collected.

#### SECTION 9: ADDITIONAL INFORMATION

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO).

Should you have a complaint against how we process your personal information, we do ask that you please attempt to resolve any issues with us first. However, in the unlikely event that we cannot allay your concerns, you have the right to make a formal complaint to the regulator.

INFORMATION COMMISSIONER'S OFFICE:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

<https://ico.org.uk/>

THE DATA CONTROLLER IS:

Healthy Pleasure Group Limited

Hampton Dene House

Hampton Dene Road

Hereford

HR1 1UX

DATA PROTECTION OFFICER:

They can be contacted on 07513 027625 or at [compliance@wearehpg.com](mailto:compliance@wearehpg.com)

SECTION 10: QUESTIONS REGARDING THIS NOTICE

If you have questions concerning this notice, please contact our privacy team at [compliance@wearehpg.com](mailto:compliance@wearehpg.com)

SECTION 11: NOTIFICATION OF CHANGES

We recommend that you check this notice every time you visit our site or provide us with your personal data offline as we may update this notice from time to time.

Any changes will be effective when posted and your continued use of the site or not objecting to the use of your personal Data will indicate your acknowledgement of any changes.

Last updated: 31 July 2023.