Data Privacy Policy

This privacy policy applies between you, the User of this Website and Pow Food Ltd, the owner and provider of this Website. Pow Food Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website. **Please read this privacy policy carefully.**

We are POW FOOD LIMITED. We are a company incorporated and registered in England. Our company number is 10950975. Our registered office address is at Unit B13 Alpha Business Centre, Minerva Road, London, England, NW10 6HJ. When we refer to "**we**", "**us**" or "**our**" in this policy, we are referring to POW FOOD LIMITED.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please email us.

You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office (*www.ico.org.uk*). If you do have a complaint, we would appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance if possible.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all personal data (as defined by the Data Protection Laws) that is either submitted to or collected by POW Food Ltd via the Website;
Data Protection Laws	all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR; the Data Protection Act 2018 (DPA 2018) (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended;
UK GDPR	has the meaning given to it in the DPA 2018;
Services	when you access our goods and services, or when you contact us directly to order or access our goods and services, for example our food delivery service and catering services;
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

User or **you**	any third party that accesses the Website and is not either (i) employed by POW Food Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to POW Food Ltd and accessing the Website in connection with the provision of such services; and
Website	the website that you are currently using, powfood.co.uk and any sub-domains of this site unless expressly excluded by their own terms and conditions.

Scope of this privacy policy

This privacy policy applies only to the actions of POW Food Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

For purposes of the applicable Data Protection Laws, POW Food Ltd is the "data controller". This means that POW Food Ltd determines the purposes for which, and the manner in which, your Data is processed.

This Website is not intended for children and we do not knowingly collect data relating to children.

Data collected

We may collect the following Datafrom you:

- **Identity Data** includes first name, last name, position, and employer/company details.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes financial information such as credit/debit card numbers and billing details.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website.
- **Usage Data** includes information about how you use our Website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

in each case, in accordance with this privacy policy.

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

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide Data

Where we need to collect 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 goods or services). In this case, we may

have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your Data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, and Account and Financial Data by filling in forms, questionnaires, or by corresponding with us by post, phone, email, or otherwise. This includes Data you provide when you:
    - contact us about or use our Services, including ordering goods from us;
    - supply us with goods or services;
    - apply for a job;
    - request marketing to be sent to you; or
    - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see our cookie policy.
- **Third parties or publicly available sources.** We will receive Data about you from various third parties and public sources as set out below:
    - Technical Data from analytics providers (Google Analytics);
    - Identity and Contact Data from publicly available sources such as Companies House.

How we use your Data

We will only use your Data when the law allows us to. Most commonly, we will use your Data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a **legal obligation**.

Generally, we do not rely on consent as a legal basis for processing your Data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Keeping Data secure

We will use technical and organisational measures to safeguard your Data, for example:

- access to your account is controlled by a password and a user name that is unique to you.
- we store your Data on secure servers.
- payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: hello@powfood.co.uk

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Purposes for which we will use your Data

We have set out below, in a table format, a description of all the ways we plan to use your Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Data for more than one lawful ground depending on the specific purpose for which we are using your Data. Please contact us if you need details about the specific legal ground we are relying on to process your Data where more than one ground has been set out in the tables below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) respond to a request for support or information	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how you use our Services)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	(c) Necessary for our legitimate interests (to study how Users use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, services, marketing, business relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)

To liaise with you if you are a customer in relation to our business or Services	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our Services and grow our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our Services and grow our business)

Marketing

We strive to provide you with choices regarding certain Data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical and Usage data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if we provide services to you and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your Data with any third party for marketing purposes.

Change of purpose

We will only use your 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your Data

We may share your Data with the parties set out below for the purposes set out in the table above:

Third party	**Detail**

Service providers:	including those who provide: ● Web hosting, IT and system administration services. ● Marketing services.
Professional advisers:	including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
Authorities:	including HMRC, regulators and other authorities who require reporting of processing activities in certain circumstances. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
Corporate partners:	includes third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your Data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Data for their own purposes and only permit them to process your Data for specified purposes and in accordance with our instructions.

International transfers and Data Security

Some of our external third parties may, from time to time, be based outside the United Kingdom (UK) so their processing of your Data will involve a transfer of data outside the UK.

If we transfer your 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:

- The country has been deemed to provide an adequate level of protection for Data by the Information Commissioner's Office.
- If we use certain service providers based outside the UK, we may use specific contracts approved by the ICO, which give Data the same protection it has in the UK.
- In any other case, we will obtain your explicit consent before any transfer takes place.

Please contact us if you want further information on the specific mechanism used by us when transferring your Data out of the UK.

Data retention

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

You have the following rights in relation to your Data:

- **Right to access** – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- **Right to correct** – the right to have your Data rectified if it is inaccurate or incomplete.
- **Right to erase** – the right to request that we delete or remove your Data from our systems.
- **Right to restrict our use of your Data** – the right to "block" us from using your Data or limit the way in which we can use it.
- **Right to data portability** – the right to request that we move, copy or transfer your Data.
- **Right to object** – the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: hello@powfood.co.uk

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk/.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

POW Food Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of POW Food Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

Changes to this privacy policy

POW Food Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact POW Food Ltd by email at hello@powfood.co.uk

Review

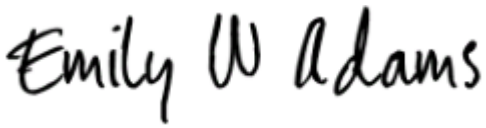
This statement shall be reviewed by our Board of Directors on a regular basis (at least annually) and may be amended from time to time.

Ali Warburton



Managing Director
1 March 2026

Emily Warburton-Adams



Co Founder
1 March 2026