

Tastees Manufacturing Limited – Privacy Policy

Introduction & Scope

Tastees Manufacturing Limited (“**Tastees**”, “**we**”, “**us**” or “**our**”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and safeguard personal data when you visit our consumer snack products website or otherwise interact with us as a customer or user. It applies to all visitors, users, and customers of our website and related services. We process personal data in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679, **GDPR**) and the Maltese Data Protection Act (Chapter 586 of the Laws of Malta), as well as other applicable data protection laws.

By using our website or services, you acknowledge that you have read and understood this Privacy Policy. We encourage you to read this policy carefully. If you have any questions about how we handle your personal data, please contact us using the details provided in the “Contact & Complaints” section below.

Who We Are

Tastees Manufacturing Limited (Company Registration No. C 1503) is a company registered in Malta with its registered address at Factory A3, Marsa Industrial Estate, Marsa MRS 3000, Malta. For the purposes of data protection laws, Tastees is the “data controller” of the personal data collected via our website or otherwise determined by this Policy. This means we determine how and why personal data is processed. If any other entity (such as a parent or affiliate company) jointly determines the purpose and means of certain processing, they may also be considered joint controllers together with us for that specific processing.

Personal Data We Collect

We collect various categories of personal data about you. “**Personal Data**” means any information that identifies you as an individual or relates to an identifiable individual. The types of personal data we may collect include:

- **Identity & Contact Data:** Name, surname, date of birth/age (if needed), billing/delivery address, email, phone number, and other identifiers.
- **Account Data:** Login details, passwords, and account preferences if you register on our site.
- **Payment & Transaction Data:** Payment details (processed securely), purchase history, order dates, and totals.
- **Customer Service Data:** Information you provide in inquiries, feedback, or support requests.
- **Usage Data:** Technical details on how you use our website, such as IP address, browser/device info, pages viewed, links clicked, and referral source.
- **Cookies & Tracking Data:** Information gathered through cookies, pixels, or similar technologies (preferences, site activity, unique identifiers, advertising IDs).

- **Marketing & Communications Data:** Your marketing subscriptions, preferences, and responses to promotions or surveys.
- **Profile Data:** Insights about your interests or preferences inferred from purchases or interactions (used for recommendations or marketing).
- **Visual Data (CCTV):** Video recordings from CCTV when you visit our premises, for security purposes.
- **Social Media Data:** Public profile information and messages when you interact with us via social media platforms.

We strive to **collect only the minimum personal data necessary** for each purpose, in line with data minimization principles. You will always be informed which data is required versus optional (for instance, mandatory fields will be indicated when filling forms). If you choose not to provide certain information, we may not be able to offer you the related service (e.g. we need contact and payment details to fulfill an order).

We do not usually collect or process “special categories” of personal data (such as health information, biometric data, religious or political beliefs). If there is ever a need to process such data, we will only do so where strictly necessary and in compliance with Article 9 GDPR, ensuring appropriate safeguards and obtaining your explicit consent where required.

We do not knowingly collect personal data from children. Our website and services are not intended for individuals under the age of 16. If we become aware that we have inadvertently collected personal data from a minor under 16 without appropriate consent, we will delete it.

How We Collect Personal Data

We collect personal data through several methods:

- **Directly from You:** When you fill out forms (e.g. create an account, place an order, subscribe to our newsletter, or contact us) or communicate with us by phone, email, or in person.
- **Automatically:** Through cookies and similar technologies that capture technical and usage data as you browse our site (see Cookies & Consent Management). Analytics tools such as Google Analytics may also collect this data.
- **From Third Parties:** Information from social networks, payment providers, delivery partners, or marketing partners (e.g. updated address details, transaction confirmations, or campaign participation data).
- **From Group Companies:** Personal data may be shared with affiliated brands or entities within our corporate group for fulfillment, promotions, or administrative purposes, in line with applicable agreements.
- **CCTV at Premises:** If you visit our physical locations, CCTV cameras may capture footage for security purposes (with on-site signage provided).

If you provide us with personal data about someone else (e.g. you buy our products as a gift for someone and give their name/address, or you refer a friend), you must ensure you have that person’s

permission or other lawful basis to share their data with us. By providing data about third parties, you confirm that you are authorized to do so.

Purposes and Legal Bases for Processing

We only use your personal data for specific, explicit purposes and where we have a lawful basis under GDPR to do so. Under GDPR, the main lawful bases we rely on are: **(a)** processing necessary to perform a contract with you or to take steps at your request before entering a contract, **(b)** compliance with a legal obligation, **(c)** our legitimate interests (or those of a third party), provided your interests and fundamental rights do not override those, and **(d)** your consent (where you have given it, e.g. for marketing or non-essential cookies). We use your data for the following purposes:

- **Providing Our Services:** Registering you as a customer, processing and delivering orders, managing payments and deliveries, and keeping transaction records. *Legal basis: contract, legal obligation, legitimate interests.*
- **Account Management & Customer Relationship:** Maintaining your account, preferences, and support requests, and communicating about orders, terms, or policy updates. *Legal basis: contract, legitimate interests.*
- **Marketing & Promotions:** Sending you newsletters, offers, or product information if you have opted in (or where allowed by law, to existing customers). You can opt out anytime. *Legal basis: consent or legitimate interests.*
- **Personalisation & Analytics:** Understanding how you use our site and products to improve performance, develop new products, and provide recommendations. Non-essential analytics rely on cookie consent. *Legal basis: legitimate interests, consent (for cookies).*
- **Advertising:** Using cookies/pixels to serve relevant ads on our site or third-party platforms. *Legal basis: consent (via cookie banner/CMP).*
- **Customer Support:** Responding to your questions, complaints, or feedback. *Legal basis: contract, legitimate interests.*
- **Security & Fraud Prevention:** Protecting our site, systems, and premises (including CCTV), preventing fraud or misuse, and ensuring lawful use of our services. *Legal basis: legitimate interests, legal obligations.*
- **Legal & Regulatory Compliance:** Meeting our obligations under tax, accounting, consumer protection, and product safety laws, and responding to lawful requests from authorities. *Legal basis: legal obligation.*
- **Other Uses (with consent):** If we need your data for any new purpose, we will inform you and obtain your consent where required.

We will **not use your personal data for purposes that are incompatible** with the ones disclosed in this Policy, unless required or allowed by law. We do *not* engage in any selling of personal data to third parties for their own marketing use, and we do not share data with third parties except as outlined below or with your permission.

Cookies & Consent Management

A cookie is a small file placed on your device that helps us improve how our website works. Once you agree, the cookie is stored and allows the website to remember your preferences and activity. This means the site can tailor its features to your needs, likes, and dislikes.

We use different types of cookies:

- **Essential Cookies:** Required for the website to function properly (e.g. keeping items in your cart or remembering your login). These are always active.
- **Analytics Cookies:** Help us understand how visitors use our website so we can improve its performance and usability.
- **Functional Cookies:** Remember your preferences, such as language settings, to provide a smoother experience.
- **Marketing Cookies:** Used to show you offers and ads that match your interests. These are only activated if you consent.

The information collected is mainly used for statistical analysis and website improvement. Cookies do not give us access to your computer or any personal data other than the information you choose to share.

You can choose to accept or decline cookies. Most browsers accept them automatically, but you can change your browser settings to decline cookies if you prefer. Please note that turning off certain cookies may prevent you from getting the best experience on our website.

How We Share Personal Data

We treat your personal data with care and confidentiality. We do not sell your information to third parties. We only share it when necessary for the purposes described in this Policy, under appropriate safeguards:

- **Group Companies:** We may share data with our parent company, subsidiaries, or sister brands for internal administration, central IT services, or joint promotions. Where we and another group company jointly decide how data is used (for example, CCTV at premises), we act as joint controllers with clearly defined responsibilities.
- **Service Providers:** We use trusted third parties to help us operate our business, such as IT and hosting providers, payment processors, couriers and logistics partners, customer support tools, and marketing platforms. These providers process your data only on our instructions and must keep it secure.
- **Professional Advisors:** Auditors, lawyers, accountants, and insurers may access data as needed when providing services to us, always under confidentiality duties.
- **Business Transfers:** If Tastees is involved in a merger, acquisition, reorganisation, or sale of assets, your data may be shared with potential or actual buyers, subject to strict confidentiality.
- **Authorities & Legal Requirements:** We may disclose data where required by law, regulation, or court order, or where necessary to protect our rights, property, safety, or to prevent fraud and unlawful activity.

- **With Your Consent:** If we ever share your data for other purposes not covered here, we will only do so with your explicit consent.

All recipients are required to protect your personal data in line with GDPR and only use it for lawful purposes. Tastees remains responsible for ensuring your data is safeguarded.

Joint Controllership (CCTV and Security)

At our premises, CCTV cameras are used for security and crime prevention. In some cases, the system is operated jointly with other companies in our group (such as our parent company). This means both Tastees and the group company share responsibility for the footage.

- CCTV is used only for security purposes, not for monitoring staff or customers beyond safety needs.
- Footage is kept for a short period and then securely deleted, unless needed for an investigation.
- Signs at monitored areas always tell you when CCTV is in use.
- If you wish to exercise your data rights (e.g. access or erasure) in relation to CCTV, you may contact either Tastees or the group company named on the signage. We will work together to ensure your rights are respected.

International Data Transfers

We mainly store and process personal data in Malta and the European Economic Area (EEA). Sometimes, however, your data may be transferred outside the EEA: for example, if we use a cloud provider or service partner based abroad.

When this happens, we ensure your data remains protected by:

- **Adequacy Decisions:** Transferring only to countries approved by the European Commission as having adequate protection.
- **Standard Contractual Clauses (SCCs):** Using EU-approved contracts that legally require recipients to safeguard your data.
- **Other Legal Grounds:** In rare cases, relying on exceptions under GDPR (such as your explicit consent or where necessary to perform a contract).

You can request details of the safeguards we use by contacting us. We will not transfer your data outside the EEA unless appropriate protections are in place.

Data Retention

We keep your personal data only for as long as necessary to fulfill the purposes set out in this Privacy Policy, or as required by law. Retention times vary depending on the type of data and why it was collected:

- **Customer Accounts:** Retained while your account is active; deleted or anonymized after a period of inactivity, unless needed for legal reasons.
- **Transactions:** Purchase and payment records may be kept for up to 10 years to meet tax, accounting, and legal requirements.

- **Customer Service:** Inquiries and communications are usually kept for a short time after resolution, then deleted.
- **Marketing:** Data is kept until you unsubscribe or withdraw consent, after which your details may be held on a suppression list to ensure no further contact.
- **Cookies:** Stored for their individual lifespan or until you clear them or withdraw consent (see *Cookies* section).
- **CCTV:** Footage is normally retained for about 7 days unless needed for an investigation.

Once data is no longer needed, we securely delete or anonymize it.

Data Security

We use a range of technical and organizational measures to keep your personal data safe from unauthorized access, loss, or misuse.

Our staff are trained in data protection, and we have procedures in place to deal with any suspected data breaches, including notifying you and the regulator where legally required. While no system can be 100% secure, we regularly review and improve our safeguards. You also play a part in protecting your data by keeping your account credentials confidential and using strong passwords.

Your Rights under GDPR (Data Subject Rights)

As a data subject, you have various rights regarding your personal data under the GDPR and Maltese law. We respect and uphold these rights. You may exercise any of these rights by contacting us (see **Contact & Complaints** below). These rights include:

- **Access:** Ask us if we hold your data and request a copy.
- **Rectification:** Correct inaccurate or incomplete data.
- **Erase:** Request deletion of your data in certain situations (“right to be forgotten”).
- **Restriction:** Ask us to limit processing in specific cases (e.g. while accuracy is checked).
- **Portability:** Receive your data in a portable format or have it sent to another provider.
- **Object:** Stop processing for direct marketing or where based on our legitimate interests.
- **Withdraw Consent:** Withdraw consent at any time (e.g. for marketing or cookies).
- **No Automated Decisions:** We do not make decisions based solely on automated processing that have significant effects.
- **Complain:** File a complaint with the Maltese IDPC. We encourage you to contact us first so we can try to resolve the issue.

We will not usually charge a fee for you to exercise these rights. However, **if a request is manifestly unfounded or excessive**, we may either charge a reasonable fee (considering the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request, as allowed by law. We will explain our reasoning in such cases.

To exercise your rights, please contact us at the email or postal address provided. We may need to **verify your identity** before fulfilling certain requests, to ensure that we do not disclose data to the wrong person.

If you believe we have not handled your data correctly, you may lodge a complaint with the Office of the Information and Data Protection Commissioner (IDPC) Malta at <https://idpc.org.mt>

Third-Party Links

Our website may include links to third-party websites, plug-ins, or applications. Clicking on those links may allow third parties to collect or share data about you. We are not responsible for the privacy practices of these third-party websites, and we encourage you to read their privacy notices before providing them with personal data.

Record of Processing Activities (ROPA)

In line with GDPR Article 30, we maintain an internal Record of Processing Activities (ROPA) which documents the categories of personal data we process, the purposes of processing, retention periods, and details of data sharing. This record helps us demonstrate accountability and compliance with GDPR.

Data Breach Notification

In the event of a personal data breach, we will assess the risk to your rights and freedoms. Where required by law, we will notify the Office of the Information and Data Protection Commissioner (IDPC) within 72 hours of becoming aware of the breach. If the breach is likely to result in a high risk to you, we will also inform you without undue delay, providing information on the nature of the breach, its potential impact, and measures taken to mitigate harm.

Profiling & Automated Decisions

We may analyse your purchase history or website use to suggest products, send relevant offers, or improve your experience. This kind of profiling is limited to marketing and service personalization. It does not create legal or significant effects for you.

You can opt out of profiling for marketing at any time, for example by unsubscribing from emails or turning off advertising cookies in our consent banner. We do not make decisions that affect you solely by automated means (such as credit or hiring decisions). If that ever changes, we will inform you first and ensure it complies with GDPR.

Group Companies & Service Providers

If your data is shared within our group (e.g. with our parent or subsidiaries) or with service providers (such as IT or logistics partners), it remains protected. All parties must follow the same privacy standards and only use your data for the purposes we specify.

We require our suppliers to keep your data secure and never use it for their own benefit. Our staff and partners are trained in data protection, and we review our practices regularly to comply with the law.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time. If we make significant changes, we will let you know through our website or, if you are a customer, by email or other direct notice.

The “last updated” date shows when the policy was most recently revised. By continuing to use our website or services after updates, you agree to the changes (where permitted by law).

We encourage you to check this page periodically to stay informed about how we protect your data.

Contact & Complaints

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your personal data, please contact us:

Tastees Manufacturing Limited

Factory A3, Marsa Industrial Estate, Marsa MRS 3000, Malta

Email: (accounts@tastees.com.mt)

Telephone: (+356 2124 4722) (during business hours)

We aim to respond to all legitimate data subject requests within one month. In complex cases or if you make multiple requests, this period may be extended by up to two further months, in which case we will inform you of the reason for the delay.