



Crumbs Ltd T/A Educatering Solutions,
Unit 1, 64 Portman Road,
Reading,
Berkshire,
RG30 1EA

Privacy Policy

For more information, please call:

Zest Support
0118 228 0568

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Background

We understand that your privacy is important to you, and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website.

Our website 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.

Any personal data We do collect will only be used as permitted by law.

All Cookies used by and on Our Site are used in accordance with current Cookie guidance. We uphold your rights as stated within the Data Protection Act 2018 and GDPR.

Recital 32

Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.

This could include ticking a box when visiting an internet website, choosing technical settings for information society services or another statement or conduct which clearly indicates in this context the data subject's acceptance of the proposed processing of his or her personal data. Silence, pre-ticked boxes or inactivity should not therefore constitute consent. Consent should cover all processing activities carried out for the same purpose or purposes. When the processing has multiple purposes, consent should be given for all of them.

If the data subject's consent is to be given following a request by electronic means, the request must be clear, concise and not unnecessarily disruptive to the use of the service for which it is provided.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

Term	Definition
“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site.
“Cookie Law”	Details of the Cookies used by Our Site are set out in Section 14, below; means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 2018, OR EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means Crumbs Ltd T/A Educatering Solutions, a company registered in England and Wales under company number 9813070, whose address is Unit 1, 64 Portman Road, Reading, Berkshire, RG30 1EA.
“Zest / Our Website / Our site”	means ‘Zest’ - the brand name used for our website at https://zest.educateringsolutions.co.uk
“System software provider”	means SchoolGrid Ltd, who own the software our site runs on, host our website and associated data, and provide system related technical and customer support.

2. Information About Us

2.1. Website

Our Zest website is hosted, maintained and supported by service provider SchoolGrid Ltd, a limited company registered in Scotland under company number SC333369, whose address is Rowan House, Quarrywood Court, Livingston, EH54 6AX.

3. Data Protection Officer

Our external Data Protection Officer for Zest related queries can be contacted by email at hello@educateringsolutions.co.uk, by telephone 0118 950 2727 or by post at Crumbs Ltd T/A Educatering Solutions, Unit 1, 64 Portman Road, Reading, Berkshire, RG30 1EA

4. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites.

Please note that We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5. Your Rights

As a data subject, you have the following rights under the GDPR, which this policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you;
- The right to rectification if any personal data we hold about you is inaccurate or incomplete
- The right to be forgotten – i.e. the right to ask us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained later in this notice but if you would like us to delete it sooner, please contact us;
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact us using the details provided and We will do Our best to solve the problem for you. If We are

unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data:

- Name;
- Date of birth;
- Gender;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as post code, preferences;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;
- When you last came to Our site
- What pages you have accessed, how long those pages took to load, and how long you stayed on that page.

Parts of this data may be provided directly to us by you, and parts of this data (in particular pupil information, parent / guardian name, and parent / guardian email address) may be provided directly to us via your child's school.

Schools use our software to conduct normal school functions such as:

- Allowing parents and guardians to control their child's school meal service
- Providing (often critical) nutrition and allergy information to parents and guardians
- Contacting parents and guardians, possibly in case of emergency
- Providing parents and guardians with cashless payment options
- Providing parents and guardians with a means to submit feedback regarding the school meals service

These functions provide several legal bases (contractual requirement, legal obligation, vital interest, and legitimate interest) for the provision of your data to us by the school, meaning explicit consent from parents and guardians is not required in this case.

7. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and

safeguard your rights under the Data Protection Act 2018, and the GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you or your child's school, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- Personalising and tailoring Our services for you;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by simply letting us know);
- Market research and catering service surveys;

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first provided to us.

Depending on your use of the site, and use of the provided payment options (such as Direct Debit) we may be legally required to keep some of your details for up to 6 years, or indefinitely (as is the case with Direct Debit user data). Where this is not legally required, we will remove data 12 calendar months following deactivation of pupil and parent accounts by the school office.

8. How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described above, and/or for as long as We have your permission to keep it.

- Depending on how you use our site and service Your data will only be stored in the UK.
- In some circumstances, such as when you contact us, your data may be stored (in accordance with our data retention policy) on Google Workspace servers, in the EU.

You are deemed to accept and agree to this by using Our Site, accepting our terms and conditions, and submitting information to Us. Where We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 2018, and the GDPR including:

- Requiring services to meet ISO 27001 Security Management Standards
- Independent security testing and verification

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

Steps We take to secure and protect your data include:

- Meeting the ISO 27001 Standards
- Rigorous internal management
- Regular testing

9. Do We Share Your Data?

Subject to the sections below, We will not share any of your data with any other third parties for any purposes.

1. In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
2. We may sometimes contract with third parties to supply services to you on Our behalf, such as card payment processing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
3. Our System software provider (SchoolGrid Ltd) is contractually required by Us to provide direct support to users of Our site. This may include providing technical support to users for use of Our website, resolving payment issues, and other Zest site related queries received at the Zest email address zest@educateringsolutions.co.uk and phone calls received on the Zest support phone line: 0118 228 0568.
4. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We do this to ensure that our site performs well and to identify any software issues.
5. We may from time to time share such data as described above with third parties such as prospective investors, school caterers (where they are contracted to provide food services at your child's school, and partners. Data will only be shared and used within the bounds of the law.

Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 2018, OR GDPR.

This site currently uses the following third party services:

Third Party Site	Used By	Description	Third Party Business	Privacy Notice
msecnd.net	website	Infrastructure	Microsoft	https://privacy.microsoft.com/en-gb/privacystatement
visualstudio.com	website	Infrastructure	Microsoft	https://privacy.microsoft.com/en-us/privacystatement
youtube.com	website	Video payback	Google	https://support.google.com/youtube/answer/7671399?hl=en
sendgrid.net	website	Email Service Provider	SendGrid	https://sendgrid.com/resource/general-data-protection-regulation-2/

10. What Happens If Our Business Changes Hands?

We 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 Our business.

Any personal data that you have provided will, where it is relevant to any part of Our business that is being 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 that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

11. How Can You Control Your Data?

In addition to your rights under the GDPR, When you submit personal data via Our Site, you may be given options to restrict Our use of your data.

You may also wish to sign up to one or more of the preference services operating in the UK:

- The Telephone Preference Service (“the TPS”), the
- Corporate Telephone Preference Service (“the CTPS”), and the
- Mailing Preference Service (“the MPS”).

And you can opt out by of many third party cookies by using:

- <https://tools.google.com/dlpage/gaoptout>
- <http://www.allaboutcookies.org/manage-cookies/opt-out-cookies.html>
- <http://www.youronlinechoices.com/uk/your-ad-choices>

These may help to prevent you receiving unsolicited marketing. Please note, however, that

these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Your Right to Withhold Information

To use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see Our Cookie Policy Section 14.

13. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge.

Please contact Us for more details at **zest@educateringsolutions.co.uk**, or using the contact details below in Section 15.

14. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third Party Cookies are used on Our Site for ensuring the visitor gets the best user experience and allows us to understand how our site is used. For more details, please refer to Section 7. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. All Cookies we use are shown below. Your consent will not be sought to place “strictly necessary” Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below or using the sites listed above, but please be aware that Our Site may not work properly if you do so.

We have taken great care to ensure that your privacy is not at risk by allowing them. The following Cookies may be placed on your computer or device:

Cookie Name	Used By	First / Third	Type	Purpose	Retention/Expiry
__AntiXsrfToken	website	First	session	Session	session
SchoolGridAuthentication	website	First	session	Authentication	session
ai_user	website	First	Persistent	Performance - Microsoft Application Insights software	1 Year
ai_session	website	First	Persistent	Performance	session

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at zest@educateringsolutions.co.uk, by telephone on 0118 228 0568, or by post at Crumbs Ltd T/A Educatering Solutions, Unit 1, 64 Portman Road, Reading, Berkshire, RG30 1EA

Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

16. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.