



SCP Snacks Ltd

Privacy Policy

Effective date: 04.04.26

UK GDPR & Data Protection Act 2018 & Data (Use and Access) Act 2025

About this policy

This Privacy Policy explains how Biltong Boss Ltd ('we', 'us', 'our') collects, uses, stores, and protects your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

It applies to data collected through our event surveys, website (biltongboss.com), loyalty programme, and any direct communications with us. If you have any questions about this policy or how we handle your data, please contact us at hello@biltongboss.com before completing any of our forms.

1. Who We Are (Data Controller)

Biltong Boss Ltd is the data controller for all personal data processed under this policy. As data controller, we determine the purposes and means of processing your personal data and are responsible for ensuring our processing complies with UK data protection law.

Company name	SCP Snacks Ltd
Registered address	210 Old Brompton Road, London, SW5 0BS C/O Accounting and Taxation Too Associate Ltd
Company number	13050022
Primary contact	info@biltongboss.com
Website	biltongboss.co.uk
ICO registration number	C1901877

Data Protection Officer (DPO)

SCP Snacks Ltd is a small business and is not currently required to appoint a Data Protection Officer under UK GDPR Article 37 (which applies to public authorities, organisations conducting large-scale systematic monitoring, or those processing special category data at scale). All data protection queries should be directed to info@biltongboss.co.uk. We will review whether a DPO is required as our data processing activities grow.

2. What Personal Data We Collect

2a. Event survey data

When you complete our customer survey at events, we collect the following information:

- Age bracket (18-29, 30-34, 35-39, 40-44, 45-49, 50-54, 55-59, or 60+)
- Gender identity (self-selected categories, including 'Prefer not to say')
- Outward postcode only (e.g. SW1) - the first section of your postcode only, never your full postcode
- Household size and current work situation
- Diet and eating style preferences (including free text 'Other' where provided)
- Physical activities and hobbies (including free text 'Other' where provided)
- Media consumption habits (including free text 'Other' where provided)
- How you categorise biltong (e.g. as a snack, cured meat, protein supplement, etc.)
- Biltong purchasing frequency, preferred flavour, spend, purchase occasions, and channels
- Purchase priorities and product interests
- Net Promoter Score (likelihood to recommend Biltong Boss on a 0-10 scale)
- How you first heard about Biltong Boss
- Email address - only if you voluntarily choose to provide it

Important: where no email address is provided, all survey responses are processed as anonymous data that cannot be attributed to any individual. Such data falls outside the scope of UK GDPR. Only responses linked to a provided email address constitute personal data under this policy.

2b. Website data

When you visit biltongboss.co.uk we may automatically collect technical data including your IP address, browser type, device type, referring URL, pages visited, and session duration. This is collected via cookies and analytics tools. Please see Section 9 (Cookies) for full details.

2c. Loyalty programme data

If you join our loyalty programme we will collect your name, email address, purchase history, and programme participation activity.

2d. Direct communications

If you contact us by email, telephone, or social media, we retain the content of that communication and any contact details you provide.

3. Why We Use Your Data and Our Lawful Basis

Purpose	Lawful basis (UK GDPR Art. 6)
Anonymous customer research, persona analysis, and product development	Legitimate Interests (Art. 6(1)(f)) - to understand our customers and improve products and services
Sending marketing emails, product news, and promotional offers	Consent (Art. 6(1)(a)) - only where you have explicitly opted in with a clear affirmative action
Operating and administering the loyalty programme	Consent (Art. 6(1)(a)) or Contract (Art. 6(1)(b)) - depending on how the programme is structured
Responding to your enquiries and complaints	Legitimate Interests (Art. 6(1)(f)) - to manage our customer relationships
Website analytics (with consent cookies only)	Consent (Art. 6(1)(a)) for non-essential analytics cookies; Legitimate Interests (Art. 6(1)(f)) for strictly necessary cookies

Compliance with legal or regulatory obligations	Legal Obligation (Art. 6(1)(c))
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Where we rely on Legitimate Interests, we have conducted a Legitimate Interests Assessment (LIA) and are satisfied that our interests do not override your fundamental rights and freedoms. You have the right to object to any processing based on Legitimate Interests - see Section 7.

4. Is Providing Your Data Mandatory?

Completing our customer survey is entirely voluntary. You are under no statutory, contractual, or other obligation to participate. If you choose not to answer certain questions, or not to complete the survey at all, there are no consequences to you whatsoever.

Questions marked with an asterisk (*) on the survey form are marked as required to submit the form. This is a technical requirement to ensure we collect the minimum data needed to make responses useful - it is not a legal or contractual requirement. You may leave the survey at any time.

Providing your email address at the end of the survey is entirely optional. If you choose not to provide it, your survey responses remain fully anonymous, and this has no impact on your ability to purchase from us or participate in our events.

5. How Long We Keep Your Data

Data type	Retention period
Anonymous survey responses (no email provided)	2 years from collection date, then securely deleted
Survey responses linked to an email address	Until you withdraw consent, or 2 years from last interaction - whichever is earlier
Email addresses and marketing consent records	Until withdrawal of consent, or 2 years from last engagement - whichever is earlier
Loyalty programme data	Duration of programme membership plus 1 year after closure
Website analytics data	26 months (standard analytics retention period)
Direct communication records	2 years from last contact
Financial and transactional records	7 years (statutory requirement under UK tax law)
Consent records and audit trail	Duration of relationship plus 1 year, as evidence of compliance

We conduct an annual review of data holdings and securely delete or anonymise any data that is no longer required for the purpose for which it was collected.

6. Who We Share Your Data With

We do not sell, rent, or trade your personal data to or with any third party. We only share personal data with the following categories of processor, all of whom are bound by written Data Processing Agreements (DPAs) that require them to process data only on our instructions and in compliance with UK data protection law:

- (Survey platform / CRM name, e.g. Typeform, HubSpot) - for storing and analysing survey responses
- (Email marketing platform, e.g. Mailchimp, Klaviyo) - for sending marketing and loyalty communications
- Google LLC (Google Workspace) - for business email, document storage, and collaboration. Google is bound by the Google Workspace Data Processing Addendum.
- (Website analytics provider, e.g. Google Analytics, Plausible) - for website traffic analysis
- (Payment processor, if applicable, e.g. Stripe, PayPal) - for processing transactions

We may also disclose personal data where required to do so by law, court order, or to protect the rights, property, or safety of Biltong Boss Ltd, our customers, or others. We will notify you of any such disclosure unless we are legally prevented from doing so.

7. International Data Transfers

Some of our processors may transfer or store data outside the UK. Where this occurs, we ensure appropriate safeguards are in place in accordance with UK GDPR Chapter 5:

- UK Standard Contractual Clauses (UK SCCs) or the International Data Transfer Agreement (IDTA) approved by the ICO
- Transfers to countries covered by UK adequacy regulations
- Transfers to processors certified under the UK Extension to the EU–US Data Privacy Framework

For example, Google LLC is certified under the Data Privacy Framework and processes data under the Google Workspace Data Processing Addendum, which incorporates the appropriate transfer mechanisms for UK data.

8. Your Rights Under UK GDPR

You have the following rights in relation to your personal data. To exercise any of these rights, please contact us at info@biltongboss.co.uk. We will acknowledge your request within 5 working days and respond in full within one calendar month (which may be extended by a further two months for complex requests - we will notify you if this is the case).

Right	What it means and how to exercise it
Right of access (Subject Access Request)	Request a copy of all personal data we hold about you. We will provide this free of charge in a commonly used electronic format.
Right to rectification	Ask us to correct any inaccurate or incomplete personal data we hold about you. We will act promptly on verified corrections.
Right to erasure	Ask us to delete your personal data. We will comply unless we have a legal obligation to retain it (e.g. financial records under tax law).
Right to restrict processing	Ask us to pause processing your data in certain circumstances, such as while accuracy is contested or an objection is being considered.
Right to data portability	Receive your personal data in a structured, commonly used, machine-readable format (e.g. CSV) to transfer to another controller. Applies where processing is based on consent or contract.

Right to object	Object to processing based on Legitimate Interests, including direct marketing. We must stop processing unless we can demonstrate compelling legitimate grounds that override your interests.
Right to withdraw consent	Withdraw consent for marketing at any time - via one-click unsubscribe in any email we send, or by emailing hello@biltongboss.com . Withdrawal does not affect the lawfulness of prior processing.
Rights related to automated decision-making	We do not use automated decision-making or profiling that produces legal or similarly significant effects on you. If this changes, we will update this policy and notify you.
Right to complain to the ICO	You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at any time if you believe we have mishandled your personal data. ICO: ico.org.uk 0303 123 1113, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

9. How We Protect Your Data

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or alteration. Our measures include:

- Access controls: only authorised staff with a business need can access personal data
- Encryption: all data in transit is protected using TLS/SSL encryption
- Two-factor authentication on all systems and accounts that handle personal data
- Data held within the UK or in countries providing equivalent protection
- Annual review of data holdings, security practices, and this Privacy Policy
- Staff training on data protection, confidentiality, and information security
- Incident response plan: in the event of a personal data breach, we will notify the ICO within 72 hours where required, and affected individuals without undue delay where the breach is likely to result in high risk to them

10. Cookies

Our website uses cookies. We use the following categories:

- Strictly necessary cookies: essential for the website to function correctly. These do not require your consent.
- Analytics cookies: help us understand how visitors use our site (e.g. pages visited, time spent). We ask for your consent via the cookie banner before setting these.
- Marketing cookies: used to track visits across websites for advertising purposes. We ask for your consent before setting these.

You can manage, change, or withdraw your cookie preferences at any time via the cookie settings banner on biltongboss.com. Withdrawing consent will not affect cookies already placed. For the full Cookie Policy see biltongboss.com/cookies.

11. Children and Young People

Our products and services are not directed at anyone under the age of 18. We do not knowingly collect personal data from anyone under 18. Our survey asks respondents to confirm they are 18 or over before submitting personal contact details.

If you believe we have inadvertently collected personal data from a person under 18, please contact us immediately at info@biltongboss.co.uk and we will delete it without delay.

12. Changes to This Policy

We review this Privacy Policy at least annually and whenever our processing activities change materially. We will post the updated version at biltongboss.com/privacy with a new effective date and version number.

For significant changes - particularly those that affect your rights or how we use your data - we will notify you by email where we hold your address, at least 30 days before the changes take effect.

13. How to Contact Us

For any questions about this policy, to exercise your data subject rights, or to raise a concern about how we have handled your personal data:

SCP Snacks Ltd
210 Old Brompton Road, London, SW5 0BS
Email: info@biltongboss.co.uk
Website: biltongboss.com/privacy

To complain to the regulator:
Information Commissioner's Office (ICO)
ico.org.uk 0303 123 1113
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF