

Privacy Policy Notice

This privacy policy notice tells you what we do with your personal information.

1. Who are we?

The Health Food Manufacturers' Association (HFMA) is a not-for-profit organisation that was founded in 1965 to represent the interests of manufacturers and suppliers of specialist health products in the UK.

2. Who is responsible for managing the data HFMA holds?

The HFMA is responsible for the collection and proper management of any personal information you submit. HFMA (the Data Controller) will keep your personal details secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Policy Notice.

We are committed to protecting your privacy and security.

3. What data do we hold?

We may collect, use, and store various types of personal information about you, including:

- Information that helps us identify you, such as your name.
- Your contact details.
- Company details and contact information.
- Purchase or client account history.
- Website user journey information
- IP addresses

Where you are provided with log-in access to our website or online services, we process personal information to manage and administer your user account, verify your identity, provide access to relevant content and functionality, and maintain the security of our systems.

This may include your username, encrypted password, account status, records of successful and unsuccessful login attempts, login timestamps, IP address, and usage information.

Login credentials and account information are protected using appropriate technical and organisational security measures to prevent unauthorised access or disclosure.

If you provide the HFMA with goods or services, then we may process personal information in connection with what you have supplied. This includes information about your expertise, and we may also keep a record if we have a concern about the

work you have done. It also includes the names and business contact details of any staff you have.

Use of contractors:

We use contractors, who may have access to personal information, in the following ways:

- We use online "cloud" platforms to help us store and access personal information. This includes our email platform and our CRM (customer relationship management) system.
- We share information with our IT contractors, for example, where they need access to our IT systems in connection with providing technical support.
- We use payment providers.
- We use mailing houses that send out communications on our behalf (this applies to email as well as postal communications).

Events:

If you attend one of our events, we may share your personal information with our partners who are supporting us. We will provide further information on this when you sign up for the event.

We will share your information with event-booking platforms such as Eventbrite.

4. Where does your data come from?

We gather personal data from a variety of sources, including our Membership registration form, websites, social media channels, responses to our communications, online surveys, emails, telephone calls, events, and your participation in our activities and events.

Additionally, HFMA retains the email addresses, names, phone numbers (including mobile), company names, and addresses of both current and former members, as well as users of the CLEAR CHECK® service, all stored securely in our database.

Subscribers may opt in to or opt out of our mailing lists at any time using the unsubscribe functionality included in our communications.

We also collect website usage information. We do this by using Cookies (see section 10).

5. Why do we hold your data?

Under data protection law, HFMA must give you information about the bases we are relying on to process your personal information. These are set out below.

Legitimate interests: This means that the use of personal information is necessary for legitimate interests except when the individual's interests and fundamental rights override those legitimate interests. Legitimate interests cover most of the activities of the HFMA. In particular, the HFMA has a legitimate interest in:

- Promoting its services, events and activities.
- Ensuring that there is an active community of supporters for what we do.
- Providing education and increasing awareness around manufacturers and suppliers of specialist health products in the UK.
- Protecting our reputation (for example, if someone was misusing our intellectual property).
- We record information about how users use our services, including usage patterns and interactions, for research and to help improve our products and services
- We rely on legitimate interests and/or the performance of a contract as the lawful basis for processing information related to website log-ins and account management. This processing is necessary to provide access to secure areas of our website, administer user accounts, ensure the proper functioning of our services, and protect against unauthorised access, fraud, and misuse

Contract: This means that the use of personal information is necessary to perform our obligations under our contract with you and for you to perform your obligations as well. This applies to HFMA Members and consumers of the CLEAR CHECK® service. For example, if you become a Member, we will need to process your data in order to perform our contractual obligations and to provide the membership benefits and services that you are entitled to.

Legal obligation: We can rely on this when we need to use personal information in order to comply with a legal obligation.

Public task: Performance of a task carried out in the public interest (or carrying out public tasks). We use this basis to process personal information at our events, for example, for health and safety reasons. It also applies to the training we provide, as there is a public interest in providing education.

Consent: Sometimes we rely on consent to process your personal information. This will be the case for certain types of communications. For example, we usually need your consent before sending you our Membership Bulletin emails. If you give your consent, you have a right to withdraw it at any time. Any use of your information before you withdraw your consent remains valid.

We do not make automated decisions about you, nor do we use profiling that has a legal or similarly significant effect

6. Promoting the HFMA and the work we do

The main ways in which we share personal information are as follows:

- Information is shared in connection with publicity. For example, To promote the work of the HFMA more generally as described below.
- For example, if a new member joins HFMA Membership, we may share their company name to help promote HFMA..

We use personal information to promote the HFMA and the work we do:

- To keep you informed about events and activities and with your attendance at those events.
- To tell you about our products and services.
- To keep you informed about what is happening. For example, by sending you our email bulletins.
- In connection with sending your information about your membership fee. This includes details related to your payment and membership status.
- In connection with the other ways in which you might support us.
- To increase engagement in HFMA's activities, for example, through market research and inviting people to take part in surveys and competitions; and to demonstrate the impact & reach of our campaigns, we may use anonymised data (such as location) as part of press releases or other promotional documents
- We may contact you for the above purposes by email, telephone, post, text message and through social media but we will only do so where this is allowed under data protection law. If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that. You can withdraw your consent at any time.

Based on the information we have about you; we may also make suggestions and recommendations to you about services that may be of interest to you. If you tell us that you manufacture or sell a certain product, we may keep a record of that.

We use personal information to help us improve our products and services. For example, whether a particular campaign was popular with a specific group.

We will use information from public sources to help us tailor our communications to you. As part of this, we will obtain information from websites including the following: social media platforms, internet search engines, and Companies House.

We may also contact individuals who we think would help us promote the work we do. For example, we may contact bloggers, influencers and journalists to ask them if they would like to participate in campaigns and share stories.

We often use photographs for marketing and promotion purposes. This includes in our and external publications, in social media and on our websites. Where we

consider doing so is necessary, we will seek your consent before using the photograph. We may also use "good news" stories in connection with our publicity.

The HFMA will also use your personal information in respect of their specific activities.

7. Particularly sensitive information

We do not ask for or retain especially sensitive personal information. This is called "special category" personal information under the data protection law. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or sexual orientation.

We do not collect special category personal information but we may do so when you attend one of our events. In these cases, we may need to use information about your health or condition so that we can make adjustments (e.g., in respect of seating or dietary requirements). Using personal information in this way is justified in the substantial public interest.

8. Who we share your data with?

HFMA never shares any of the data we hold with third parties. However, data is collected automatically on HFMA's website (www.HFMA.co.uk) for the purposes of website analytics and is shared with Google.

Information collected for research and analytics is generally aggregated and anonymised, and we do not share identifiable personal data with third parties for this purpose, except where required to maintain our services.

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place to protect your information in line with UK data protection law.

Our IT service providers and cloud-based platform providers may process personal information relating to website hosting, user authentication, account management, and security monitoring on our behalf. These providers act only on our instructions and are subject to appropriate contractual and security obligations.

9. How long we hold your information for?

We will only keep Members' data, prospecting Members, resigned Members and consumers of the CLEAR CHECK® service personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Once a member resigns from HFMA's membership, their data will be stored in a database. We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of securely.

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

In many cases, we will keep your personal information for seven years.

Personal information relating to website user accounts and log-in activity is retained for as long as an account remains active and for a reasonable period thereafter for security, audit, and administrative purposes. Where an account is no longer required, associated personal data will be securely deleted or anonymised in line with our retention policies and legal obligations.

10. HFMA Website and Cookies

This notice also applies to how personal information is used through our website.

HFMA's website uses cookies and other similar technologies to distinguish you from other users of our website. As you interact with our website, we may automatically collect information about your equipment, browsing actions and patterns. For detailed information on the cookies we use and the purposes for which we use them, see our Cookies Policy: <http://hfma.co.uk/wp-content/uploads/2026/01/HFMA-Cookie-Policy-2026-v1-External.pdf>.

We will use the information we collect through your interaction with our website to:

- Ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution; and
- To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences.

This is for our legitimate interest in giving you content which is bespoke to you and making sure that our website runs smoothly.

11. Social media and external websites

To understand how your personal data is processed when using HFMA's social media channels, you can view the privacy policies for [LinkedIn](#) and [YouTube](#).

HFMA's website contains links to other websites. This Privacy Policy Notice only applies to HFMA and HFMA's website, so when you link to other websites, you should read their own Privacy Policies.

12. How can you access and update your information?

These rights apply to all personal information we hold about you, including information associated with your website user account and log-in activity, where applicable.

You have the right to request a copy of the information that HFMA holds about you. This includes the right to ask us for copies of your personal information and to request further details about where we obtain your personal information from and who we share it with. There are some exemptions, which means you may not receive all the information you ask for. [Read more about the right of access](#).

If you would like a copy of some or all of your personal information, please email or write to us at the address in the contact section at the end of this document, stating that you are applying for a "subject access request" in relation to your data. We will respond to this request within 30 days.

You also have the following rights in relation to your personal information:

- **Your right to rectification** – You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** – You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** – You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** – You have the right to object to the processing of your personal data. . [Read more about the right to object to processing](#).
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. . [Read more about the right to data portability](#).
- **Your right to withdraw consent** – Where we use consent as our lawful basis for processing, you have the right to withdraw your consent at any time.

13. Protection against Data Breaches

Astaris (referred to as the Data Processor) and HFMA have systems in place to safeguard your data, but should there be a breach, our members and the Information Commissioner's Office would be contacted within 72 hours.

14. Your right to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

15. How do we update this Privacy Policy Notice?

HFMA keep our Privacy Policy Notice under regular review and we will place any updates on our webpage. This Privacy Policy Notice has been reviewed on Jan 2025.

16. Contact

Please contact HFMA if you have any questions about our Privacy Policy Notice or information we hold about you; by email: hfma@hfma.co.uk or write to us at: Health Food Manufacturers' Association, 1 Wolsey Road East Molesey, Surrey KT8 9EL.