

Leela's Lunches Data Protection Policy

1. Introduction Leela's Lunches is committed to protecting the personal data of its customers, employees, suppliers, and other stakeholders. This Data Protection Policy outlines Leela's approach to data protection and compliance with applicable data protection laws and any relevant UAE regulations.

2. Scope This policy applies to all personal data processed by Leela's, including data collected from customers, employees, suppliers, and other third parties. It covers all aspects of data processing, including collection, storage, use, sharing, and disposal.

3. Principles of Data Protection Leela's adheres to the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** Data is processed lawfully, fairly, and transparently.
- **Purpose limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in an incompatible manner.
- **Data minimisation:** Only necessary data for the intended purpose is collected and processed.
- **Accuracy:** Data is kept accurate and up to date.
- **Storage limitation:** Data is retained only for as long as necessary.
- **Integrity and confidentiality:** Data is processed securely to protect against unauthorised or unlawful processing, loss, destruction, or damage.
- **Accountability:** Leela's is responsible for demonstrating compliance with these principles.

4. Data Collection and Processing Personal data collected by Leela's may include:

- Customer information (e.g., name, contact details, dietary preferences, payment details)
- Employee records (e.g., name, address, payroll, health and safety records)
- Supplier and business partner information (e.g., contact details, bank account information)

Data processing activities may include:

- Managing customer orders and providing catering services
- Employee payroll and HR administration
- Supplier and contract management
- Marketing and customer relationship management

5. Legal Basis for Processing Leela's processes personal data based on the following legal grounds:

- **Consent:** When individuals provide explicit consent.
- **Contractual necessity:** When data processing is required to fulfil a contract.
- **Legal obligation:** When processing is necessary to comply with legal requirements.
- **Legitimate interest:** When processing is necessary for the legitimate interests of Leela's, provided it does not override individuals' rights.

6. Data Security Measures Leela's implements technical and organisational measures to ensure data security, including:

- Encryption of sensitive data
- Access control and authentication measures
- Secure data storage and backup systems
- Staff training on data protection and security

7. Data Subject Rights Individuals have the following rights regarding their personal data:

- Right to access their data
- Right to rectification of inaccurate data
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object to processing

8. Data Sharing and Third Parties Personal data may be shared with third parties only when necessary and in compliance with data protection laws. This includes:

- Service providers (e.g., payment processors, IT support)
- Regulatory authorities where required by law
- Business partners under contractual obligations

Leela's ensures that all third-party data processors adhere to strict data protection standards.\

9. CCTV and Investigation Data

Leela's Lunches may operate and retain CCTV footage for investigation, security, safeguarding, and operational review purposes. CCTV recordings will be retained for a maximum period of **30 days**, unless a longer retention period is required as part of an active investigation or legal requirement.

CCTV footage will **not be shared with any third party**, and access will remain strictly controlled. Footage may only be shared with the relevant school where required for an investigation and only following appropriate **CEO approval** prior to release. Any access, review, or sharing of CCTV footage for investigative purposes will be documented and managed in accordance with data protection requirements.

10. Data Retention and Disposal Personal data is retained only for as long as necessary for its intended purpose and in compliance with legal requirements. Upon expiration of the retention period, data is securely disposed of through deletion, shredding, or other secure methods.

11. Data Breach Management In the event of a data breach, Leela's will:

- Assess the breach and mitigate any risks
- Notify affected individuals and relevant authorities, if required
- Take corrective measures to prevent future breaches
- Document the breach and response actions taken



12. Compliance and Training All employees handling personal data must comply with this policy. Leela's provides regular training and awareness programs to ensure data protection compliance.

13. Review and Updates This policy is reviewed regularly and updated as necessary to reflect changes in laws, regulations, and best practices.

This Data Protection Policy ensures that Leela's Lunches upholds the highest standards of data privacy and security while complying with applicable regulations.