

Privacy notice



Introduction

At Bloom, we respect your privacy and are committed to protecting your personal data in accordance with the UK GDPR and other applicable laws such as the Privacy Electronic Communications Regulation ("PECR") 2011. We've created this privacy notice to tell you how we look after your personal data when you visit the Bloom website (regardless of where you visit it from) and to tell you about your privacy rights and how the law protects you.

Purpose of this privacy notice

This privacy notice aims to give you information on how Bloom collects and processes your personal data through your use of this website or our systems Pro-vide 2.0 and Marketplace, including any data you may provide through this website or via our systems when you submit an enquiry..

This website is not intended for children and we do not knowingly collect data relating to children. If we become aware that we have inadvertently collected data relating to children we will delete it from our systems.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Bloom Procurement Services Limited (incorporated and registered in England and Wales with company number **08045123** whose registered office is at Point 5, New Eden House, Fletcher Road, Gateshead, NE8 2ET) is the controller and responsible for your personal data (collectively referred to as "Bloom", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the team in the ways explained below:

Contact details

Full name of legal entity: Bloom Procurement Services Limited

Our Data Protection Manager is Lee Dixon and we engage Evalian Limited to provide Data Protection Officer services.

(www.evalian.co.uk)

Email address: projects@bloom.services

Postal address: Point 5, New Eden House, Fletcher Road, Gateshead, NE8 2ET

Telephone number: 020 3948 9400

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). Please contact us in the first instance, we would appreciate the chance to deal with your concerns before you approach the ICO.

Changes to the privacy notice and your duty to inform us of changes

This version of the Bloom privacy notice was last updated in November 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform

and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, purchases or orders made by you, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing and communications from us.
- **Recruitment Data** includes the information you use when completing job applications via our careers section.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Other than for recruitment and employment purposes we do not collect any special category personal data about you relating to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data nor do we collect any information about criminal convictions and offences. The only health information we may hold about you is where, as part of your registration as a customer, you tell us that you require enhanced screen accessibility options. We will retain this information in your individual supplier profile for as long as you remain an active user of our platform.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with professional services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, interacting with our website or otherwise. This includes personal data you provide when you:

- apply for our services
 - apply for one of our job roles or become an employee
 - create an account through our website
 - subscribe to our service or publications
 - complete our online “Get in Touch” form
 - send us an online message
 - request information to be sent to you, or
 - give us feedback.
- **Indirect capture of personal data.** On occasions your name, contact details and business email address may be provided to us by a third party e.g. if you are nominated by your employer as an approver in our customer billing process or if the third party is a customer wishing to recommend you as a supplier for a project.
 - **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google and Mouseflow
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and

fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a lawful basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us or through unsubscribe links (see more below under “opting out”).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data under more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Legitimate interest
To process and deliver your project including: (a) To register or update a project using information previously supplied to us (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Legitimate interests

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Asking a Third Party to seek a review or conduct a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Legitimate interests</p>
<p>To administer and protect our business, website, Marketplace and Pro-vide 2.0 (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
<p>To use data analytics to improve our website, services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business)</p>
<p>To manage our relationship with you should you apply for a role with us or become an employee</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Special Category</p> <p>(d) Financial</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to comply with and perform our employer obligations)</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. These are set out in more detail below.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you registered as a customer and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any company outside of the Bloom group of companies for marketing purposes

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties
 - Pro-vide 2.0
 - Bloom Marketplace
 - Exchequer
- External Specific Third Parties
 - Sugar CRM
 - Jaggaer
 - Sage Accounting
 - Google Cloud BigQuery
 - Cezanne HR
 - Mouseflow
 - North East Procurement Organisation (NEPO)
 - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also need to share personal data with any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation or (ii) to exercise, establish or defend our legal rights.

Data sharing and international data transfers

Due to the nature of our business, there may be times when we are required to share personal data

with other departments and members of our group organisation. Examples of when we may need to share personal data can include for recruitment purposes, IT concerns, and any questions or concerns regarding data protection received from other departments.

If there are instances where we need to transfer personal data outside the UK, this may be to companies who are in the European Economic Area (The EU member states, Norway, Iceland, and Liechtenstein), in an adequate listed country or in other countries who may not have similar data protection laws to the UK. If we need to transfer your information outside the UK, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

For how long will Bloom use your personal data?

We will only retain your personal data 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.

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

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further

information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights as a data subject

Under the UK General Data Protection Regulation you have certain data protection rights . In summary, those include rights include:

- access to copies of your personal information
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner](#) .

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you (e.g. account number, username, registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates including any account or reference numbers, if you have them.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if necessary (e.g. printing costs if a request is quite large and requires multiple copies of documents). Alternatively, we may refuse to comply with your request if it is deemed

repetitive, excessive, unfounded or vexatious.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.