The Rye Bakery Loyalty Scheme

Loyalty Scheme Privacy Notice

FOR SOLICITOR REVIEW | Version 1.0 | Prepared 26 October 2026

Controller: Jempsons Bakers Ltd, company number 03807207, trading as The Rye Bakery. Registered office: Jempsons Superstore, Main Street, Peasmarsh, Rye, East Sussex, England TN31 6YD. **Contact:** mail@jempsons.com.

Effective date: to be inserted on approval • This notice relates to the Rye Bakery digital loyalty scheme, not every other aspect of our business.

1. Who is responsible for your information?

Jempsons Bakers Ltd decides why and how personal information is used to run The Rye Bakery loyalty scheme, so it is the **data controller** for the scheme. Our loyalty technology supplier, **LoyaltyDog Ltd**, generally handles member data as our **data processor** under its published Data Processing Agreement. LoyaltyDog also acts as an independent controller for limited platform security, cross-platform fraud prevention, legal compliance and suppression records, as described in its own Privacy Policy.

Our in-store point-of-sale (POS) system is provided by Epos Now, which states that it acts as a data processor when handling the personal information of a merchant's customers. The LoyaltyDog integration links our member accounts with eligible in-store till purchases, refunds and rewards. Epos Now's published API supports customer names, contact details, birthdays, loyalty identifiers and point balances, and transaction identifiers, dates, amounts and product records. This is a description of potential data categories, not a claim that every field is exchanged in our installation; the records actually used depend on the integration and till configuration.

2. Information we collect

Information you provide when joining: first name, surname, email address and mobile telephone number (required); full date of birth (optional). The Scheme is for people aged 16 or over. We also record whether you have affirmatively agreed to marketing, and changes to your account and marketing preference.

Membership and pass information: join date and time; a membership/pass identifier or card number; whether a pass has been installed where recorded; available points and rewards; voucher issue, use and expiry records; actions or changes made to an account; and relevant Apple Wallet/Google Wallet pass or push identifiers used by the service.

Purchase and refund information linked to your account: transaction reference or number, amount, date and time, transaction platform, points awarded or deducted and related voucher or reward use. Where supplied by the POS integration, product/item details and the participating store may also be processed. The Epos Now API is able to hold a broader range of POS information, but our loyalty records are intended to use information necessary to award and redeem benefits. We do not require payment-card numbers to register for the Scheme.

Communications and administration: your marketing permission and changes to it; messages or vouchers sent to you and delivery status where recorded; emails to customer service, account recovery and any investigation of errors or suspected misuse.

Technical information: LoyaltyDog and relevant service providers may process pass/device tokens, IP addresses, browser/device details, access logs, security records and diagnostic information needed to operate or protect the service, depending on the features used.

3. Where the information comes from

Most account information comes directly from you when you sign up or amend your account. We receive transaction and refund details from participating store tills through the Epos Now and LoyaltyDog integration. We also receive loyalty activity and communication-status information generated when you use the Scheme, request account help, redeem an offer or use your Wallet pass.

4. Why we use it and our lawful bases

Purpose	Information used	UK GDPR lawful basis
Provide your membership, Wallet pass, points and redemptions	Identity/contact; account, transaction, points and reward records	**Contract**: to operate the Scheme you choose to join.
Email a requested pass, respond to service queries, fix errors, handle refunds	Contact details; transactions; service enquiries	**Contract**, and **legitimate interests** in resolving queries and operating a reliable programme.
Prevent duplicate accounts, repeat welcome claims, fraud and misuse	Unique email/phone; identifiers; account and transaction actions	**Legitimate interests** in a fair and secure Scheme, subject to a proportionality assessment.
Calculate and offer birthday benefits when you supply DOB	Optional full date of birth; account and eligibility	Contract for the optional birthday reward feature; consent for the promotional communication.
Send promotional vouchers and Wallet offers, and select relevant offers	Contact/pass identifiers; one recorded marketing choice; optional purchase and reward activity for offer selection	Consent, obtained through the optional affirmative marketing drop-down and changeable online.
Keep required records, respond to legal issues and safeguard our rights	Limited account, communication and transaction records	**Legal obligation** where required; otherwise **legitimate interests** for legal claims.
Protect the system and troubleshoot faults	Technical logs and identifiers, activity records	**Legitimate interests** in service security and reliability.

Where we rely on legitimate interests, we consider whether our reasons are proportionate to the effect on customers. You can ask us for more detail. You do not have to give your date of birth, but without it we cannot determine birthday-reward eligibility. Name, email and telephone number are required to join and support unique-account checks.

5. Marketing and your choices

Membership is not conditional on receiving marketing. On the joining page and when editing your details, you may positively select “Yes” in one optional marketing drop-down. This gives permission for Rye Bakery promotional offers, welcome and birthday voucher emails, and promotional digital-Wallet messages. Leaving it blank, or choosing “No”, means no marketing permission is given. There is no SMS marketing under this Scheme.

LoyaltyDog treats automatically issued welcome and birthday voucher messages as marketing. Under our configuration they are offered only to members whose marketing preference is “Yes”; birthday vouchers also require an accurate date of birth. You can still earn points and redeem points-funded rewards without marketing.

If we manually select groups for relevant offers, our staff may review Scheme purchase or reward activity to choose recipients who have agreed to receive that type of marketing. We do not intend to make solely automated decisions which produce legal or similarly significant effects on members.

You can turn marketing on or off at any time using the online account link on the back of your Wallet pass. If you cannot access online settings, you can also ask us to stop marketing at mail@jempsons.com, and we will act on your request as soon as reasonably possible. Changing the preference to “No” stops future promotional messages and new promotional vouchers; existing points and points-funded rewards are unaffected. You are not required to explain why you are withdrawing marketing permission.

We retain the marketing preference and a proportionate record of changes and suppression identifiers where necessary to respect a withdrawal and avoid reinstating marketing by mistake. Your phone’s Wallet notification settings govern whether notifications are displayed on your phone, but do not themselves alter your Rye Bakery marketing choice recorded in your online account. Promotional Wallet notifications open the pass or relevant voucher, and the account-preferences link is on the back of the pass.

6. Wallets and location-relevant reminders

You can choose to add your pass to **Apple Wallet** or **Google Wallet**. Apple and Google provide those Wallet products as independent organisations with their own terms, permissions and privacy notices. Your device may display your pass or a nearby-store reminder using store information configured for the pass and your Wallet location settings.

The Scheme is not intended to track your journeys or store a history of your movements. Location-relevant Wallet reminders use store location information and your device’s Wallet location permissions. Jempsons does not collect or receive your device-location information. Apple and Google determine when to display relevant passes or notifications under their own privacy practices.

LoyaltyDog's published documentation refers more generally to location information for enabled features; the exact deployment-specific data flow remains subject to provider confirmation.

You can control location access and notification visibility through your device and Wallet settings. To withdraw your consent to Rye Bakery marketing, change your marketing preference in your online loyalty account using the link on the back of your pass; device settings alone are not recorded as withdrawal of that choice.

7. Who receives information

We share the information needed to run the Scheme with the following service providers and categories of recipients:

- **LoyaltyDog Ltd**, which hosts/operates the loyalty programme and passes on our instructions. Its published Data Processing Agreement (Schedule 1 to its Merchant Terms, version 12.4) lists suppliers including **DigitalOcean** (UK-hosted databases/backups), **Twilio SendGrid** (email delivery), **Amazon Web Services SNS** (message delivery), **Cloudflare** (network/security), **Sentry** (diagnostics) and **Freshworks/Freshdesk** (support when a ticket involves member information).
- Epos Now (UK) Limited, as the POS supplier and a processor for information held in our till system, and the integration between Epos Now and LoyaltyDog. Relevant account identifiers, contact details and in-store transaction or reward data may be accessed or exchanged to identify members and apply points or offers. The exact fields used in a specific installation depend on its configuration; see the public Epos Now developer documentation and Epos Now Privacy Policy.
- **Apple and Google**, where you choose their Wallet functionality. They operate their Wallet services under their own privacy policies rather than as LoyaltyDog subprocessors.
- Professional advisers, insurers, law enforcement or regulators where necessary and legally justified, and a business successor if a transfer occurs subject to the relevant legal safeguards.

We do not sell your loyalty personal information to advertisers. We do not use it for third-party advertising or for unrelated companies' loyalty programmes.

8. Processing outside the United Kingdom

LoyaltyDog says member databases are primarily stored in the **United Kingdom**, using the DigitalOcean London region. LoyaltyDog staff may access data from **Israel**. Some limited processing by the named service providers takes place outside the UK, including the **United States** and the European Union.

LoyaltyDog's published DPA says Israel is covered by UK adequacy arrangements and that other transfers use an applicable adequacy arrangement (where available) or safeguards such as the **UK International Data Transfer Agreement**, the **UK Addendum** to EU Standard Contractual Clauses, or other valid safeguards. You can request information about relevant safeguards from **mail@jempsons.com**. This statement should be checked against our final contracts and the current supplier list before publication.

9. How long we keep personal information

We retain personal information only as long as reasonably necessary. While an account is open, we keep membership records needed for non-expiring points, vouchers, corrections and refunds. When an account closes, unused benefits end and information no longer needed is deleted or anonymised, except for proportionate legal, security, antifraud, dispute, suppression and backup records. The following table summarises the retention criteria.

Data	Retention approach
Open membership, points, purchase-linked loyalty history and unredeemed benefits	While the account remains open to maintain non-expiring points, reward balances and corrections; reviewed for continued necessity.
Closed membership and underlying live loyalty profile	Account and rewards end on closure; no-longer-needed live profile information is deleted or anonymised as instructed, with narrowly justified legal, audit, antifraud and backup exceptions.
Marketing preferences and suppression identifiers	While needed to demonstrate the marketing choice and honour withdrawal; minimal suppression identifiers may be retained after account closure where appropriate.
Customer enquiries and disputes	For the time necessary to deal with the issue and any relevant lawful record or claims period.
Technical/security logs and backups	According to necessary security/diagnostic periods and the provider's normal backup deletion cycle; deleted data in isolated backups is not used and any restored deletion is reapplied.

LoyaltyDog's own 24-month account/contact retention statement concerns records it controls and is not an automatic expiry period for Rye Bakery members. We periodically review whether old support, audit, backup or closed-account records are still required. Where data must be retained, access is restricted and it is not used to issue new marketing without permission.

10. Your data-protection rights

Subject to applicable law, you may ask to see personal information about you, correct inaccuracies, have information erased, restrict certain uses, object to processing based on legitimate interests, or receive data in a portable format where applicable. You may withdraw marketing consent at any time and you have the **absolute right to object to use of your personal information for direct marketing**, including related selection or profiling.

To exercise rights, or ask about how we use information, contact **mail@jempsons.com**. We may need to verify your identity. We normally respond within one month, subject to lawful extensions or exemptions.

You can also complain to the UK **Information Commissioner's Office (ICO)** at **https://ico.org.uk/**. You do not have to contact us first.

11. Registration website, cookies and other websites

The Rye Bakery loyalty registration page is https://app.loyalty.dog/l/T14PsfST7zI. Account settings, including marketing preferences, are accessed through the link on the back of each member's Wallet pass. LoyaltyDog hosts the registration and account pages. Its own Cookie Notice is available at https://loyalty.dog/cookie-notice/. Use of cookies or similar technologies on the hosted signup and account pages is subject to applicable law.

The hosted registration and account pages may use necessary security or session technologies. Whether other cookies or local-storage technologies are used must be verified with LoyaltyDog; the absence of a cookie banner does not establish that none are used. Solicitor to confirm any disclosure or consent obligation.

12. Changes to this notice

We will normally give at least 30 days' notice before material changes to this Privacy Notice or to the way the Scheme uses member information, using an appropriate Scheme channel. A shorter period may be necessary to comply with law, address a security matter or respond to another urgent requirement. Where a new purpose requires your consent, we will ask for it before that use begins. Minor clarifications may be published without a separate notice.

For questions write to **Jempsons Bakers Ltd, The Rye Bakery loyalty team, Jempsons Superstore, Main Street, Peasmarsh, Rye, East Sussex, England TN31 6YD**, or email **mail@jempsons.com**.