

## **Our Privacy Policy**

EC Drummond (Agriculture) Ltd (“**EC Drummond**” or “**We**”), is an agri business and we provide produce across a number of different areas as indicated on our website. Our registered address is The Homme, Hom Green, Ross on Wye, Herefordshire, HR9 7TF. Our company registration number is 00715017.

We are committed to ensuring the privacy of our clients, contractors and suppliers and other website visitors. In this policy we explain how we hold, process and retain your personal data.

### **Information**

Personal information refers to any information that identifies or can be used to identify you. We may collect information about employees, workers and contractors in a variety of ways either directly or indirectly. Information can be collected through the recruitment process either directly from you or from a 3<sup>rd</sup> party, such as a recruitment agency. We may also collect personal information from other external parties, such as references from former employers, information from background check providers, information from credit reference agencies and criminal record checks from the Disclosing and Barring Service (DBS).

Information will also be collected while you work for the Company. This may be through your work-related activities. Whilst some of the personal information you provide to us is mandatory and/or is a statutory or contractual requirement, some of it may be asked to provide us on a voluntary basis. Information collected would include, but not limited to your full name, email address, contact telephone number.

We may be required to change this policy from time to time in order to remain effective. Any questions regarding this policy should be directed to [hrrsupport@ecdummond.co.uk](mailto:hrrsupport@ecdummond.co.uk) or by writing to EC Drummond (Agriculture) Ltd, The Homme, Hom Green, Ross on Wye. HR9 7TF or contact us via telephone on 01989 764328.

### **Website**

When you contact us through our website the information we collect may include your name, address, email address and contact telephone number. However, we may process data about your use of our website. The website data may include your IP address, geographical location, browser type and version, time zone setting, browser plug-in types, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This data may be obtained through analytics and would be processed for analysing the use of the website and any services.

### **Transfers of your personal data outside of the European Economic Area**

Your personal data may be transferred and stored outside of the EEA. It will also be processed by staff of our suppliers operating outside of the EEA.

Where your personal data is transferred outside of the EEA, we will ensure that either (a) The European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

### **Retaining and deleting personal data**

We review our retention periods regarding the holding of personal data on a regular basis. Personal data shall not be kept for any longer than is necessary for the purposes of the business.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your interests or the interests of another natural person.

## **Amendments**

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are aware of any changes to this policy.

We may notify you of changes to this policy by email.

## **Your rights**

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may where required withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

The rights you have under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for any additional copies.

If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.

In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.

In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

### **Access to your information**

Your information will never be sold to any third parties. We will not share your information with any organisation involved in marketing data information.

## **Third Parties**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: pension administration, benefits provision and administration, IT services.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. Data is provided to our third-party service providers for specified purposes and not for use for their own purposes.

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Transferring personal information outside the European Economic Area**

We will not transfer your personal information to countries outside of the European Economic Area (EEA). However, if there is a requirement to transfer your personal information outside the EEA then we will write to you to explain why we need to do this and will look to ensure you can expect a similar degree of protection in respect of your personal information.

## **Data Security**

We have put in place appropriate measures to protect the security of your information.

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

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are lawfully required to do so.

## **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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Withdrawing Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please

contact the HR Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Complaints**

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.

### **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will advise you of any substantial updates and provide you with access to a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.

### **Queries**

If you have any questions about this employment privacy notice or how we handle your personal information, please contact the HR Manager ([hrsupport@ecdummond.co.uk](mailto:hrsupport@ecdummond.co.uk)).