

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 1 of 7

IT Governance are experienced data protection practitioners and all document templates are provided as general guidance. Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and IT Governance accepts no liability of any sort arising from the use of these templates.

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Specialist Farm Enterprises Ltd (SFE Ltd) collecting/processing their personal data.
- 2.2 All Employees/Staff of SFE Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

SFE Ltd is the management company for the dairy buying groups Border Farmers Ltd, Maryvale Farmers Ltd and Wrexham Dairy Group Ltd. It also provides agricultural and recruitment consultancy services.

Our GDPR Owner can be contacted directly here:

- office@specialistfarmenterprises.co.uk
- 01952 540 986

The personal data we would like to collect from and use on you:

Buying groups and agricultural consultancy

- All personal information would be supplied from you directly to us upon becoming a member of the buying group.

Recruitment consultancy

- Personal information may be obtained through responses to adverts placed on on-line job boards by a candidate submitting a CV for an advertised role.

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 2 of 7

The personal data we collect will be used for the following purposes:

Buying groups and agricultural consultancy

- Buying groups members' information will be shared with the groups' suppliers to enable delivery and invoicing.

Recruitment consultancy

- Candidates' data will be shared with farmers looking to fill vacancies after permission from the candidate has been received.

Our legal basis for processing for the personal data:

- Arrange supply of goods to farm at competitive prices
- Ensure goods ordered are delivered onto farm in a timely manner
- Facilitate invoicing and payment of goods delivered onto farm
- Arrange interviews for candidates looking for work on farm

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Supply of agricultural goods through the buying groups
- Agricultural consultancy
- Recruitment consultancy

No special categories of personal data are required

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for SFE Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by informing us in writing to SFE Ltd, 1 Mill House, Peplow, Market Drayton, Shropshire TF9 3JS or by emailing office@specialistfarmentprises.co.uk.

3.3 Disclosure

SFE Ltd will not pass on your personal data to third parties without first obtaining your consent.

3.4 Retention period

Buying groups and agricultural consultancy

SFE Ltd will process personal data for the duration of membership of a buying group and will store the personal data as per HMRC guidelines for storing accounts data following a member leaving the group.

Recruitment Consultancy

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 3 of 7

SFE Ltd will process personal data for the duration that a candidate is actively looking for work. If a person is placed in a job on farm, their personal data will be stored for one year for recruitment purposes and then follow the HMRC guidelines for storing accounts data.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that SFE Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by SFE Ltd (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and SFE Ltd's data protection representatives GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Helen Snodgrass	Helen Snodgrass
Address line 1:	1 Mill House	1 Mill House
Address line 2:	Peplow	Peplow
Address line 3:	Market Drayton	Market Drayton

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 4 of 7

Address line 4:	Shropshire	Shropshire
Address line 5:	TF9 3JS	TF9 3JS
Email:	office@specialistfarmenterprises.co.uk	office@specialistfarmenterprises.co.uk
Telephone:	01952 540 986	01952 540 986

3.7 Privacy statement

Read more about how and why we use your data:

www.specialistfarmenterprises.co.uk

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, SFE Ltd, will collect and use your personal data for buying group membership, agricultural consultancy services or recruitment consultancy

Why does SFE Ltd need to collect and store personal data?

In order for us to provide you agricultural and recruitment consultancy we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes SFE Ltd would contact you for additional consent.

Will SFE Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to SFE Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with SFE Ltd's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 5 of 7

How will SFE Ltd use the personal data it collects about me?

SFE Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. SFE Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will SFE Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

SFE Ltd, at your request, can confirm what information we hold about you and how it is processed. If SFE Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of SFE Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 6 of 7

- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

SFE Ltd accepts the following forms of ID when information on your personal data is requested:

Passport, birth certificate, utility bill (from last 3 months), etc.

Contact details of the GDPR Owner:

	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Helen Snodgrass
Address line 1:	1 Mill House
Address line 2:	Peplow
Address line 3:	Market Drayton
Address line 4:	Shropshire
Address line 5:	TF9 3JS
Email:	office@specialistfarmenterprises.co.uk
Telephone:	01952 540 986

Document Owner and Approval

The GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the company server and is published on the website www.specialistfarmenterprises.co.uk.

Signature: *Helen Snodgrass*

Date: 25/5/18

Change History Record

Issue	Description of Change	Approval	Date of Issue

PRIVACY NOTICE (TIER 4)

Document Control

Reference: SFE Ltd - GDPR

Issue No: 1

Issue Date: 25th May 2018

Page: 7 of 7
