

Woldgrain Storage Ltd

Privacy Policy

Woldgrain Storage Ltd is committed to protecting and respecting your privacy.

In accordance with the General Data Protection Regulation, (EU 2016/679) known as GDPR. This policy sets out the basis on which any personal information or data you provide us with, will be processed by us.

We may change this privacy notice from time to time. If so, we will notify you by email and by updating our website.

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

The data controller is Woldgrain Storage Ltd.

INFORMATION WE HOLD FROM YOU

- **Personal information you give to us.** This is information that you give to us whenever you become a member of the Society; your name, farm/business address, email address, phone numbers and bank details. The standard Membership Agreement form which details the amount of storage rights you have purchased and at what price you paid for those. In addition, before each harvest, you tell us what crops you intend to store with us. We will use this data as a means of communicating with you.
- **Personal information we collect from you.** When you become a Member you are issued with a username which we only use to allow you to gain access to the Member area of the website. We do not collect any personal information via our website. Our members' area is not monitored for usage, nor do we use Cookies. Our website partners, Graphica and Oliversoft have confirmed that they do not collect or retain data from our members. We do not receive and nor do we seek any information from any other sources. From time to time Oliversoft may be a processor of your information. They have confirmed that they do not retain any information.

We do not receive any personal data about you from third parties.

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:

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we

have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

We process your personal data to:

- Register you as a member.
- Deliver all member/contractual services to you, including stock control, invoicing, fees and charges.
- Manage our relationship with you, including notifying you about changes to our terms or privacy policy.
- Improve our services, customer relationships and experiences.
- Make suggestions and recommendations about goods or services that may be of interest to you.
- Manage movement of your grain at harvest.

RETENTION OF PERSONAL DATA

We will only retain your personal data for as long as you remain a member of the Society and thereafter to satisfy any legal, accounting, or reporting requirements, generally accepted as 7 years.

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 RIGHTS

Under certain circumstances, by law you have the right to:

- Request access to your personal data, and receive a copy of your personal data, held by us.

- Request correction of incomplete or inaccurate personal data held by us.
- Request deletion of your personal data, where there is no good reason for us continuing to process it or where we have processed it unlawfully.
- Object to processing of your personal data where we are relying on a legitimate interest and you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing your personal data.
- Request the transfer of your personal data to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

If you would like to exercise your rights in respect of any of the above points, please contact us at info@woldgrainstorage.co.uk.

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.

WHERE WE STORE YOUR PERSONAL DATA

All information is either stored on our secure servers, located at our offices, or securely filed in paper format. We do not transfer your personal data outside the European Economic Area (**EEA**).

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 SHARING

We will not share, sell or swap your personal information with any other organization or third party, without your written consent.