

Welsh Lamb & Beef Producers Ltd

WLBP Privacy Policy 1 August 2021

Introduction

Welsh Lamb & Beef Producers Ltd (**WLBP**) is an agricultural cooperative society registered under the Co-operative and Community Benefit Societies Act (previously the Industrial & Provident Societies Acts). WLBP recognises your right to privacy and is committed to protecting your personal data. This privacy policy explains how we look after personal data and your privacy rights and explain your rights in law.

It is important that you read this privacy policy together with any other notices we may provide on specific occasions when we are collecting or processing personal data about you, including those occasions when we collect data in accordance with any contract we may have with you so that you are fully aware of how and why we are using your data.

This document supplements other notices you may have received from us; it is not intended to override them.

Why do we need to collect your personal information?

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

- (a) to consider and assess your application for membership with us;
- (b) to manage and administer your membership account;
- (c) to provide you with information about our events and/or competitions we offer that we think you may be interested in together with any relevant services offered by third parties;
- (d) to provide you with information that you ask us for and notify you about changes to our services;
- (e) updating and enhancing database records;
- (f) to improve our website to ensure that content is presented in the most effective manner for you;
- (g) to keep our website safe and secure;
- (h) 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;
- (i) where we need to comply with a legal obligation; and
- (j) to create, produce and evaluate data reports and information in accordance with your membership with us.

Controller

Welsh Lamb & Beef Producers Ltd is the controller and is responsible for certain personal data relating to you.

If you have any questions about this privacy notice, please contact WLBP's Chief Executive by writing, telephoning or emailing Welsh Lamb & Beef Producers Ltd, Gorseland, North Road, Aberystwyth SY23 2WB (01970) 636688 and/or info@wlbp.co.uk.

Information Commissioner

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy policy

WLBP keep our privacy policy under regular review. This version was last updated on 1 May 2021. Historic versions can be obtained by contacting us.

Updating information

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

Our Website includes links to third-party websites. 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 policy 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 (anonymised data) or where identifying characteristics of data has been replaced with a pseudonym (pseudonymised data).

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

Identity Data may include first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data may include invoice address, delivery address, email address and telephone numbers.

Financial Data may include bank account and payment card details.

Technical Data may include 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 our Websites.

Profile Data may include your username and password.

Usage Data may include information about how you use our Websites, products and services.

Management Data may include information relating to your membership of one of WLBP's assurance schemes.

We also collect, use and share aggregated data such as statistical, assurance schemes data 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.

We do not collect any data about you such as your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do collect data about whether you speak Welsh or not and whether you prefer for us to communicate with you in the Welsh language.

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, if Scheme members fail to provide data we have requested under the Membership Rules, we may not be able to administer your membership of the Scheme and may have to cancel your membership, 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, financial and transaction data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you may provide to us when you apply to become a member of WLBP or one of its schemes.
- **Automated technologies or interactions.** As you interact with our Websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - identity and contact data from Quality Welsh Food Certification Ltd, (QWFC) a WLBP associated company accredited by the United Kingdom Accreditation Service (UKAS) as operating to ISO 17065. QWFC is the certification bodies that certifies our assurance schemes;
 - Information about criminal convictions and offences from publicly available sources;
 - Government agencies such as DEFRA;
 - The Press; and
 - Other industry stakeholders, for example farming unions and other businesses such as veterinary practices, markets, abattoirs and retailers.

Legal grounds for collecting and using your personal data.

Data protection laws require us to explain our legal grounds for processing your personal data. We use the term processing to describe everything we do with your personal data from its collection, right through to its destruction or deletion. This includes sharing your data with other organisations.

The legal grounds that are relevant to us are:

- Processing which is necessary to **perform our contract** with you or for taking steps prior to entering into it (during the application stage). We use this ground for:
 - a) administering and managing your membership account and updating your records; and
 - b) sharing your personal information with other providers such as when you ask us to share information about your account with them.

- Processing which is necessary to comply with our **legal obligations**. We use this ground for:
 - a) compliance with laws that apply to us;
 - b) establishment, defence and enforcement of our legal rights;
 - c) activities relating to the prevention, detection and investigation of crime;
 - d) to carry out identity checks and anti-money laundering checks;
 - e) to carry out monitoring and to keep records;
 - f) to deal with requests from you to exercise your rights under data protection laws;
 - g) to process information about a crime or offence and proceedings related to that; and
 - h) when we share your personal information with the organisations listed below.

- Processing which is necessary for our own **legitimate interests** or those of other organisations (who we have listed below), where these interests are not outweighed by any prejudice to your rights and freedoms. We use this ground for:
 - a) administering and managing your accounts and updating your records;
 - b) to supply services to our members and non members;
 - c) for management and audit of our business operations;
 - d) to adhere to guidance and best practice under the regimes of governmental and regulatory bodies;
 - e) to carry out monitoring and to keep records;
 - f) to promote, market and advertise our services;
 - g) to carry out searches at Credit Reference Agencies (where applicable);
 - h) to undertake analysis and generate reports for services in accordance with the terms of your membership with us; and
 - i) for direct marketing communications.

- Processing with your **consent**. We use this ground for:
 - a) when you request that we share your personal data with someone else and consent to that; and
 - b) some of our processing of special categories of personal data.

Generally we do not rely on consent as a legal basis for processing your personal data and is instead based on other legal grounds. For processing that is based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details above.

Keeping in touch with you

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you.

You will receive marketing communications from us if you have requested certain information or have purchased from us or have used one of our services. You can opt-out of any marketing messages at any time by contacting us at any time.

Third-party marketing

We will not share your personal data with any other organisation for marketing purposes other than our associate company QWFC Ltd, without first obtaining your consent.

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 our Websites may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

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 legal 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.

Sharing your personal data

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

- External Third Parties as set out in the *Glossary*.
- 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.

International transfers

We may transfer your data to US-based External Third Parties if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention - How long will you use my personal data for?

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.

In some circumstances we may anonymise or pseudonymise 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

Under certain circumstances, you have rights under data protection laws in relation to your personal data listed below.

We may need to request specific information from you to help us to 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.

We aim to respond to all legitimate requests within one month, but occasionally it could take us longer than one 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.

There is no fee for making a request to access to your personal data (or to exercise any of the other rights listed below). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Please note that not all of these rights will apply to all of your personal data.

- The right **to be informed** – we have to be transparent with you about the processing that we do with your personal data. This is why we have a privacy notice.
- The right to ask us **to correct your personal data** if it is inaccurate and to have incomplete or inaccurate personal data we hold about completed or corrected, though we may need to verify the accuracy of the new data you provide to us.
- The right to **object to our processing of your personal data** where it is based on our legitimate interests (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms or where it is processed for direct marketing or where it is processed for the purposes of statistics. In some cases, we may demonstrate that we have compelling legitimate

grounds to process your information which override your rights and freedom.

- The right to **restrict processing** of your personal data in certain circumstances. This enables you to ask us to suspend the processing of your personal data if you want us to establish the data's accuracy or where our use of the data is unlawful but you do not want us to erase it or where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to **ask us to have your personal data erased**. This right is not absolute – it applies only in particular circumstances and, where it does not apply, we will tell you. We will not be able to comply if we are required to keep your personal data in order to comply with a legal obligation or to exercise or defend legal claims.
- The right to **request access to the personal data held** about you. This is often described as a Subject Access Request. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- The right to **ask for your personal data in a reusable format** (known as the right to data portability). This right only applies where personal data is being processed based on your consent or for performance of a contract and is carried out by automated means. This is separate to a Subject Access Request.

If you wish to exercise any of the rights set out above, please contact us.

GLOSSARY

THIRD PARTIES

External Third Parties

- Individuals or organisations seeking to verify claims of membership of a WLBP assurance scheme, WLBP is required to confirm such a request under ISO 17065.
- Service providers acting as processors based in the UK who provide IT, marketing and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Where required, to maintain Earned Recognition status for members of our assurance scheme by Welsh or UK Government, Trading Standards, Food Standards Agency, National Resources Wales, Health & Safety Executive or where a Scheme assessor comes across evidence of an immediate and significant risk of unacceptable animal welfare, food contamination or environmental pollution.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.