

Grampian Growers Privacy Notice

INTRODUCTION

At Grampian Growers, we are committed to protecting your information and acting in accordance with your rights under data protection law. Documenting and sharing standards through this Privacy Notice is of the utmost importance to Grampian Growers, its employees, and customers.

In the course of its activities, Grampian Growers processes both employee and customer Personal Information. In this respect, Grampian Growers protects the Personal Information it processes by the implementation of appropriate technical, physical and administrative measures and controls. Such controls shall ensure that the whole organisation is Processing Personal Information in a consistent manner.

As a consequence of the above and taking into consideration standards, regulations and laws applicable in the field of data protection, and the requirements introduced by the European Regulation 2016/679 adopted on 27th April 2016 (The GDPR) Grampian Growers will process Personal Information in accordance with the following principles:

1. **Lawfulness** – Personal information shall be collected, and Processed with you having given consent to the Processing or when Processing is legitimate or necessary in accordance with Applicable Data Protection Legislation;
2. **Fairness** – Personal information Processing shall take into account the specific circumstances and context in which such Personal information is Processed;
3. **Transparency** - Information and communication relating to the Processing of Personal information shall be easily accessible, easy to understand, clear and in plain and simple language;
4. **Purpose limitation** – Personal information shall be collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes;
5. **Data minimisation** – Collected Personal information shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed
6. **Accuracy** – Personal information shall be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that Personal information that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without undue delay;
7. **Storage limitation** – Personal information shall be kept in a form which permits identification of You for no longer than is necessary for the purposes for which the Personal information is Processed or any other lawful retention;

WHAT THIS POLICY COVERS

Grampian Growers may have to process various categories of Personal information, such as:

Your personal details such as Business name, contact details, address

Economic and financial data (such as bank details, VAT number);

Notwithstanding the above, this Privacy Notice applies to the Processing of Personal information by Grampian Growers irrespective of its category, its nature or the status of Grampian Growers acting as a Data Controller or as a Data Processor.

How we use your information

We use your information for the following purposes:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. 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.
4. Where we have your consent.

Disclosing your information

We typically share your information with the following recipients:

Our suppliers,

Greenyard Ltd

Lingarden Ltd

MM Flowers Ltd

XPO Logistics

ACL Shipping

De Ree Holland

Branston Ltd

Greenvale AP

E Park and Son

IPL Ltd

Harry Taylor Transport

Alan Davie Ltd

LC Packaging

Science and Advice for Scottish Agriculture (SASA)

Scottish Government Rural Payment Inspectorate Department (SGRPID)

Grampian Growers undertakes not to transfer any Personal information to organisations which are not part of the Grampian Growers group unless such organisations provide sufficient guarantees and have implemented appropriate technical and organisational measures in such a manner that the Processing will meet the requirements of this Privacy Notice.

In this respect, Grampian Growers has implemented appropriate technical, physical and administrative measures to ensure and control that Personal information is not unlawfully accessed and/or Processed.

WORKING TOGETHER TO PROTECT PERSONAL INFORMATION

Each Grampian Growers employee, as a Data Subject, shall benefit from the provisions of this Privacy Notice. As protecting Personal information is a matter of individual and organisational commitment, each employee must also comply with the requirements specified under this Privacy Notice.

As such, the Privacy Notice falls within the set of policies Grampian Growers employees are required to comply with as part of their employment contract.

As a Cooperative Grampian Growers wants to ensure that all related members belonging thereto are bound in the same or a similar manner to the principles and obligations specified under this Privacy Notice and will comply with the requirements specified herein.

For this reason, this Privacy Notice is binding upon all related members of the Grampian Growers Cooperative.

Where Grampian Growers engages another Data Processor such as another Grampian Growers company or third-party provider for carrying out specific Processing activities, such Data Processor shall provide sufficient guarantees to implement appropriate technical and organisational measures in a manner that the Processing will meet the requirements of this Privacy Notice.

PRINCIPLES FOR PROCESSING PERSONAL INFORMATION

The Applicable Data Protection Legislation defines a set of principles to be observed when Processing Personal information. Grampian Growers undertakes to comply with these principles

Defining a legal basis for Processing

When Personal information is being Processed, it is required that such Processing relies upon an appropriate legal basis, such legal basis being the foundation that allows for lawful Processing.

In this respect, Grampian Growers undertakes to lawfully Process Personal information only where it has a valid legal basis to do so pursuant to the requirements of the Applicable Data Protection Legislation.

Unless specifically authorised by Applicable Data Protection Legislation, Grampian Growers shall ensure that it has ascertained a lawful, fair, explicit and legitimate purpose prior to any collection or Processing of Personal information.

Grampian Growers undertakes to ensure that the purposes it defines do not breach the Applicable Data Protection Legislation and appear to be legitimate while ensuring Personal information is not further Processed in a manner that is incompatible with those purposes.

Your Rights

You are entitled to benefit from the following rights:

Have access to the Personal information relating to you and Processed by Grampian Growers;

Request the rectification or deletion of any inaccurate or incomplete Personal information relating to you, and of any Personal information with respect to which the purpose of Processing is no longer legal or appropriate;

Request that the Personal information Processing relating to you be limited;

Object to the Processing of your Personal information at any time, unless such Processing is required by applicable law and provided that you demonstrate that you have a legitimate ground relating to your particular situation; and

Receive your Personal information in a structured, commonly used, machine-readable format and interoperable when the Processing is carried out by automated means.

Minimising Personal information collection

Grampian Growers commits to collect and process Personal information which is strictly adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed.

Personal information shall not be collected widely in the perspective of a further undefined purpose.

Accuracy of the Personal information

Grampian Growers shall implement adequate measures and controls to ensure that the Personal information it collects, and processes remains accurate and, where necessary kept up to date. To this end, Grampian Growers undertakes to implement any required actions to take every reasonable step to ensure that Personal information that is inaccurate, having regard to the purposes for which it is Processed, are erased or rectified.

Data retention – our data retention period is 5 years from your last processing date.

When feasible, Grampian Growers will implement measures in order to have the Personal information deleted or anonymised from the moment the identifiable form of such data is no longer necessary.

Implementing security measures

Grampian Growers has implemented appropriate technical, physical and administrative measures and controls to ensure that Personal information is not unlawfully accessed and/or Processed. Such technical, physical and administrative measures shall ensure a level of security appropriate to the risk, including, but not limited to, accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal information transmitted, stored or otherwise Processed by Grampian Growers and any Data Processor.

Implementing Personal information Breach notification measures

Grampian Growers shall without undue delay, and where feasible, not later than 72 hours after having become aware of it, notify the Personal information Breach to:

1. the Privacy Leader of Grampian Growers;
2. the Information Commissioner (ICO), unless the Personal information Breach is unlikely to result in a risk to the rights and freedoms of natural persons.

Transparency and fairness

Grampian Growers commits to provide sufficient guarantees and to implement appropriate technical and organisational measures in a manner that the Processing will meet the requirements of this Privacy Notice

OUR COMPLAINT HANDLING PROCEDURE

You are entitled to lodge a complaint regarding the Processing of your Personal information if you believe Grampian Growers Entity are non-compliant.

To submit a complaint please do one of the following:

Call: 01674 830555

Email: info@grampiangrowers.co.uk

write: Grampian Growers Ltd, Logie, Montrose, Angus, DD10 9LD

Your complaint will be handled by Grampian Growers in due course and with particular care and attention according to the steps and timing defined in this document.

This process is also the way to inform us that you wish to exercise your rights to access, update or delete your Personal information.

Grampian Growers commits to revert to you with a reply to your complaint within one month from the date such complaint is lodged.

In the event Grampian Growers decides to reject a complaint made by you, Grampian Growers undertakes to inform you about its decision and to provide you with information regarding the reason for such dismissal. In such a case, Grampian Growers acknowledges that you remain entitled to lodge a claim before a court and/or data protection authority.

In the event Grampian Growers considers that a complaint is justified, Grampian Growers commits to implement the corrective measures it deems adequate to remedy such situation as soon as reasonably possible. In addition, Grampian Growers will also inform you once the corrective measures have been implemented and the situation is remedied.

TRAINING AND AWARENESS

Protecting Personal information is not only a matter of compliance with privacy laws; it is part of the embodiment of Grampian Growers core values. In this context, fostering a privacy culture within the group is essential to make all employees, trainees, and other persons whose conduct, in the performance of work is under the direct control of Grampian Growers accountable for the protection of Personal information Processed as part of Grampian Growers operations.

STATUS OF THIS PRIVACY NOTICE AND AUDIT

Grampian Growers commits to develop and integrate into its audit program the review of its compliance with this Privacy Notice.

This privacy notice was last updates in May 2018

It may be subject to amendments. Any future changes or additions to the processing of personal information as described above in this privacy notice affecting you will be communicated to you via this site.