

# Strutt & Parker (Farms) Limited

## Privacy Notice for Website Users

### Introduction

Strutt & Parker (Farms) Limited is one of the leading farm businesses in the UK. We recognise that when you visit our website and provide us with personal information, you trust that we will act responsibly and keep your information secure and confidential. This privacy notice outlines how we will collect, store and use your personal data through your use of our website.

It is important that you read this notice, together with any other privacy notice or policy we may provide on specific occasions when we are collecting or processing personal information.

We are committed to safeguarding your personal information. Whenever you provide personal information to us, we are legally obliged to use it in accordance with all laws concerning the protection of personal information (we refer to these laws collectively in this privacy notice as the “data protection laws”)

### What information will we collect about you?

Personal data, or personal information, means any information about an individual from which that individual can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- Identity and contact details such as your name, title, billing address, delivery address, email address and telephone number.
- Enquiry information submitted by you.
- Usage and technical data about how you use our website including data about your browsing actions and patterns.

We collect this information through:

- **Direct interactions.** You may give us your personal information when corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also use analytics services providers such as Google.

Without your permission, we will not disclose information about your visits to our website – or any other personal information that you may give us – to any third parties.

We do not collect any special categories of personal data about you via this website (for example, details about your race or ethnicity, religious or philosophical beliefs, political opinions or information about your health).

We do not carry out any marketing activities with the data you provide to us via this website.

### Our purposes for using your personal data

We have set out below a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal

ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Lawful basis for processing</b>
To process and respond to any requests or enquiries submitted by you	Necessary for our legitimate interests (to run our business)  To take steps to enter into a contract with you.
To administer and protect our business, website and software programmes (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud etc.)  Necessary to comply with a legal obligation
To deliver relevant website content to you and use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to keep our website updated and relevant, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Where we need to collect your personal data for the purposes set out above, if you fail to provide that data we may not be able to provide our services to you (for example, responding to a request or query that you submit to us).

### **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

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 this website may become inaccessible or not function properly.

### **Third party links**

For your convenience, our website may offer automatic links (hyperlinks) to third-party websites. We are not responsible for the content of these sites. When you use links to other websites, our privacy policy no longer applies and you should refer to the privacy statement of the website you are accessing via the link.

### **How will we share and disclose your personal data?**

We may 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 lawful basis for doing so.

We may need to share your personal information with the following parties for the relevant purposes set out above:

- Our service providers supplying IT and system administration services and other technical IT services including data analytics.
- Our professional advisors who provide consultancy, legal and accounting services.

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. Where the third parties we use are data controllers in their own right (for example, the payment processors we use) then they will be required to comply with data protection laws.

### **International transfers**

We do not transfer your personal data outside the European Economic Area (**EEA**).

### **Data security**

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. Details of these measures may be obtained from us using the details in the "Contacting us" section below.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **How long will we keep your 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.

By law we have to keep basic information about our customers for six years after they cease being customers for tax and other legal purposes. We may retain your contact details for these purposes.

In some circumstances you can ask us to delete your data: see section below for further information.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal information. This may include the following rights:

- **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing of your personal information.** This right applies where we are relying 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information** to another party (known as the “right to data portability”).
- **Right to withdraw consent.** In any circumstances where we have relied on 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. 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. This will not affect the lawfulness of any processing carried out before you withdrew your consent.

If you wish to exercise any of the rights set out above, please contact us using the details in our “Contacting us” section below.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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 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.

### **Data Protection Authority**

You have the right to make a complaint at any time to the UK supervisory authority for data protection issues. This is the Information Commissioner's Office (ICO) whose details can be accessed via the ICO website at <https://ico.org.uk/global/contact-us/>

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do get in touch using the details in our “Contacting us” section below.

### **Changes to this privacy notice**

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

If you have any questions about this privacy notice, please let us know using the “Contacting us” details below.

### **Contacting us**

Our full details are:

Full name of legal entity: Strutt & Parker (Farms) Limited

Name of Data Privacy Manager: Charlie Fillingham

Email address: [Charlie.fillingham@spfarms.co.uk](mailto:Charlie.fillingham@spfarms.co.uk)

Postal address: 1 Whitbreads Business Centre, Chatham Green, Chelmsford, Essex, CM3 3FE

Telephone number: 01245 363030

Or use our secure contact form at: <https://spfarms.co.uk/contact-us/>