

Privacy Statement - Customer

As a Company H J Lea Oakes Ltd and Oakes Millers Ltd ("we", "us" or "the company") process personal data about our customers to enable us to fulfil our contractual obligation to you. GDPR covers **individuals** only.

This data may be held in paper or electronic forms.

Under the GDPR, there are **six data protection principles** that we as a company must comply with. These say that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

We are responsible for, and must be able to demonstrate compliance with, these principles.

Personal information or data is any information about an individual from which that individual can be identified.

We reserve the right to make **changes to our privacy notices**. Material changes will be communicated to our customers prior to becoming effective.

Your rights

The GDPR includes the following rights for individuals:

You have the **right to be informed** about the processing activities we carry out using your data. This is provided in this privacy notice.

You have a **right to access** your data and to request to see what data we hold for you. Please complete our subject access request form.

The **right to erasure**. You can request that we erase your data if holding it is no longer necessary in relation to the original purpose it was collected for unless it is required for a legal obligation.

The **right to restrict processing** of your data if you believe it is inaccurate.

You have the **right to rectification**. If we hold incorrect or incomplete information for you, we have to correct this when you ask us to do so.

You have the **right to object** to how we process your data, if you consider we are doing something you don't agree with. You can complain to the ICO or other supervisory authority.

You have the **right to request us to transfer** data you have provided to us to a third party if the data is part of an automated process.

You have the right to choose to **not** be subject to **automated decision making profiling**. We do not handle your data in this way.

None of your data is transferred outside the UK.

We **never** sell your information on to 3rd parties.

Types of data we hold on our customers

Below is a list of the different types of data that we may hold on you, why we hold it, and if we get it from or send it to third parties. We don't hold all the information below for all customers. Only some of this may be applicable to you. We have to hold certain information to enable us to fulfil our contract with you and for the purpose of everyday trading.

| Data Type | How it will be used | How long it will be kept | Recipients of data | Where was the data obtained? | Sensitive |
|--|--|--------------------------|------------------------------------|---------------------------------------|-----------|
| Name | In our agribusiness/financial computer systems for queries/trading. In detailed VAT reports. | 99 months if not trading | 3 rd Party Hauliers | Customer | No |
| Address | In our agribusiness/financial computer to deliver/send invoices and statements to. | 99 months if not trading | 3 rd Party Hauliers | Customer | No |
| Telephone number | In our agribusiness/financial computer system for queries/trading | 99 months if not trading | 3 rd Party Hauliers | Customer | No |
| Email Address | In our agribusiness/financial computer system for queries/trading and to send invoices and statements to | 99 months if not trading | None | Customer | No |
| Bank Sort Code and Account Number and Payee Name | In our financial computer system for claiming monies due | 99 months if not trading | None | Customer | No |
| VAT registration number | As a note in your record in our computer system | 99 months if not trading | HMRC (if requested on a VAT audit) | Customer | No |
| Date of Birth | In credit checks to enable decision making re credit accounts | 99 months if not trading | None | Experian (only with explicit consent) | No |

| Data Type | How it will be used | How long it will be kept | Recipients of data | Where was the data obtained? | Sensitive |
|---|--|--------------------------|-----------------------------|------------------------------|-----------|
| Farm access information/delivery instructions | In our agribusiness software to determine which vehicles can access your property and any special delivery instructions to be followed | 99 months if not trading | None | Customer | No |
| Medicated Feed Stuffs Form/ Prescription requests | Used to create an order of medicated feed | 7 years | Vets/BVA VMD | Customer/Vet | No |
| Costings Information incl Name, Address Herd Size, Milk Price & Composition, Feed Qty & Price | Input into database to create information on herd performance to go back to customer | 99 months if not trading | Customer & Rep | Customer | No |
| Forage Analysis | Composition of samples are examined by a 3rd party to provide diet analysis | 99 months if not trading | Customer/ Rep/ Analysis Lab | Customer/ Analysis Lab | No |

Our financial software calculates average debtor days and individual customer turnover.

How long do we keep your data?

We may store the personal information that you have provided to us through the various methods described in this Privacy Notice & in our databases such as our Customer Relationship Marketing database.

We will only keep your personal information for as long as it is reasonably necessary taking into consideration our need to answer your queries or resolve problems, provide improved and new products & services and comply with legal requirements under applicable laws.

This means that we may retain your personal information for a reasonable period after you stop trading with us. Please see the tables for specific retention details. After this period, your personal information will be deleted from all of our systems.

Please remember that you have a right to request to have your personal information deleted at any time.

Legal Basis of Consent

We operate a CRM system separate to our trading system. This system will enable us to communicate better with you by automating price list roll out and to help identify individuals' who may benefit further from our knowledge and skills and other products we may be able to offer you. We have to gain your specific consent to use your data in this system.

The system holds all of the data held above but also includes information that our sales representatives have found out by speaking to you which may help them to identify the best product to suit your needs but also services or meetings that may be of interest to you. It also contains history of when and how we contact you and your contact preferences.

Security

We use a number of computer systems and third parties to help us to administer our systems, including our network. These are our data processors. We take both physical and technical security very seriously and ensure that sufficient measures have been taken to protect the data we hold by our third parties too.