



Harlow Agricultural Merchants Ltd

PRIVACY NOTICE

This information is our privacy notice. It explains what we do with your personal information, why we want to use it, how we protect it, and what rights you have to control our use of your personal data.

Information about the data controller

The data controller is Harlow Agricultural Merchants Ltd, Latchmore Bank, Little Hallingbury, Bishop's Stortford, Hertfordshire, CM22 7PJ. Our company number is 1520770 and our registration number with the Information Commissioner's Office is Z5651783.

The purpose and lawful basis for processing your personal data

We use information for a few different purposes and these each have a different lawful basis. This section describes these in detail and, although it's technical, we're required by law to explain this to you.

The personal data that we collect may include:-

- Name
- Date of Birth
- National Insurance Number
- Billing Address, Delivery Address, Home Address
- Personal Email/Business Email
- Home/Work/Mobile Telephone Numbers
- Financial Information including bank account details

If you are an existing HAM customer, we hold your name contact details because we have a contractual obligation to deliver services to you. We need your contact details to deliver our services (such as send you update emails when you need to take actions, send you invoices and so on.) We will hold your information for no longer than six years from the termination of our working relationship.



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If you are a previous HAM customer, in the following six year period since the end of our working relationship, we may continue to contact you with information about HAM services because we think you will find it useful. We believe we have a legitimate interest in this direct marketing activity (and this is also permitted under the Privacy and Electronic Communications Regulations or “PECR”). If we do contact you in this way, you are always able to unsubscribe by emailing us at info@harlow-ag.co.uk, writing to us at Latchmore Bank, Little Hallingbury, Bishop’s Stortford, Hertfordshire, CM22 7PJ, alternatively contact Anne Rosborough, 01279 658313.

If you are an employee of (or temporary or associate worker at) an existing HAM customer, you should note that we have most likely been given your personal data by your employer, we may not have collected it from you directly. We hold your name, job title and contact details so that we can help your employer raise awareness of and grow their business. We have a legitimate interest in being able to use this information in this way. We will hold your personal information for no longer than 6 years from the last time we were in email contact with you or our customer.

If you are a business customer, supplier or other contact of our customer, we may have been given your personal information by that customer or been passed a business card. In which case, we may hold your name, job title and business contact details because we have a legitimate interest in doing business with your company. We will aim to hold this information for six years since we were last in contact with you or our customer.

If you are a supplier or other organisation associated with our line of business, we will hold your contact details because we have a legitimate interest in doing business with your company. We will aim to hold this information for no longer than 6 years since we were last in contact with you. It’s possible we picked this information up from public directories or that you passed your details to us with a business card.



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Other legitimate reasons for processing would include:

- Using personal data to conduct and manage the business in a way that enables the company to give the best service/product and the best and most secure experience to its customers/suppliers but that the company will consider and balance any potential impact on the individuals rights (both positive and negative) and that personal data is not used for activities where the company's interests are overridden by the impact using the data might have on the individual (unless consent is given or are otherwise required or permitted to by law).

Who we share your personal data with

Data Processors

We use a number of different service providers (acting as "data processors") who provide IT and system administration services to enable us to operate our business and the services we provide to our users and partners. Your personal data is transferred to (and stored by) these data processors, who generally fall under the following categories:

- Document storage service providers
- Email, contacts and calendar service providers
- Accounting/Payroll software service providers
- Software service providers

The types of personal data we hold about you (and that might be transferred to our data processors) are set out above.



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Other circumstances in which we may share personal data with third parties

We may also share your personal data with the following third parties in certain circumstances:

- We will share personal information with law enforcement or other authorities (such as tax authorities) if required by applicable law.
- We may share personal information with third parties to whom we may choose to sell, transfer, or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way we set out in this privacy notice.
- We may share personal information with professional advisors such as lawyers, accountants or auditors in order for them to provide legal, accounting or auditing services to us.
- We will share personal information on to third parties to whom the company chooses to sell, transfer or merge parts of the business or assets and that if that happened the new owners may use personal data in the same way as set in the privacy notice.

We will not sell or rent your information to third parties and we will never share your information with third parties for marketing purposes other than our own marketing activity.

International transfers of personal data, and the measures in place to safeguard it

We do not directly transfer any of your personal data outside the European Economic Area (EEA). However some of data processors may do so and this section explains the impact of these international transfers and how your information is protected.

Many of our data processors operate “cloud-based systems”, which means the information is held in information data centres in different locations. All the cloud-based systems we use reserve the right to hold copies of your personal information outside the EEA to hold back-up copies, so they can guarantee recovery.



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In each case we and/or our processors use one or more of the following means that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of abuse:

- Certain processors may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Providers storing data in the US may be self-certified to the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Your personal data rights

The personal data we hold about you is your data, so you have certain rights over them. This section summarises your rights. You can exercise any or all these rights when you choose, and the easiest way is by dropping us an email at info@harlow-ag.co.uk

You have the right to ask us for a copy of your data. You also have the right to ask us to rectify and delete your personal data, to restrict its use, and to obtain a copy of the information you have provided to us in a structured, commonly used and machine readable format and to transmit it directly to another organisation. You also have the right to request further information about the handling of your personal data. You also have the right to object to the processing of your data by us in some circumstances, in particular where we don't have to process the data to comply with a contractual or other legal requirement. There are some exceptions to these rights, however. For example, access may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information.

Where we are processing your data based on a "legitimate interest" (underlined in the section on Purpose and Lawful Basis) you have the right to object to our processing of that data. From that point, we must stop processing your data until we have determined whether your rights override our interests.



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Your rights to lodge a complaint with the Regulator

At all times, you have the right to report a concern or lodge a complaint with the Information Commissioner's Office. Please refer to the ICO at <https://ico.org.uk/concerns/> or by calling them on 0303 123 1113

Of course, we hope that we can resolve your issue quickly and fairly – you can contact us at info@harlow-ag.co.uk, or speak to Anne Rosborough 01279 658313.

Our contractual requirements of your personal data

If you're a Harlow Agricultural Merchants Ltd (HAM) customer, it's a requirement that we collect personal information from you so that we can enter into a contract with your company.

Other purposes for processing personal data

We don't process your personal data for any other purpose than we've described here. We won't sell your personal data to other companies.

As we develop our products and services, we might add or change our data processing. Should we do so and believe that it will affect your personal data, we will contact you to let you know what we intend to do, the lawful basis we will use, and your rights over our intended new processing.

If you have any questions, concerns or want some more information about our privacy management, email info@harlow-ag.co.uk, or call Anne Rosborough 01279 658313, alternatively write to Harlow Agricultural Merchants Ltd, Latchmore Bank, Little Hallingbury, Bishop's Stortford, Hertfordshire. CM22 7PJ