# E H L Data Protection Policy

## Definitions

The Company holds personal data about its employee,members, customers, suppliers andotherindividualsforavarietyofbusinesspurposes.Thispolicysetsout how we seek to protect personal data and ensure that Directors and Officers of the Companyunderstandtherulesgoverningtheiruseofpersonaldatatowhich they have access in the course of theirwork.

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**Business purposes**

The purposes for which personal data may be used by us:

Membership management, selling and sales administration, event administration, financial management, data collection and analysis.

*Business purposes include the following:*

- *Compliance with our legal and governance obligations and goodpractice*
- *Ensuring privacy policies are adhered to (such as policies covering email and internetuse)*
- *Selling, collecting payments and distributing these to growers, recording transactions, collection of statistical data about hop growing, quality assessment, event management, distribution of information.*
- *Investigatingcomplaints*
- *Promoting the sale of hops*
- *Improving services tomembers*

Personal data

Information relating to identifiable individuals, such as current and former members, self-employed and employed staff, suppliers and customers.

*Personal data we gather may include: individuals' contact details. For employed staff, details of qualification certificates and diplomas, education and skills, marital status and job title.*

Sensitive personal data

*Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings is not requested, sought or held by the Company.*

## Scope

This policy applies to all officers and Directors of the Company .
You must be familiar with this policy and comply with its terms.

This policy supplements any other policies relating to internet and email use.

## Who is responsible for this policy?

The responsibility for this policy rests with the Board

## Our procedures

Fair and lawful processing

We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to us doing so.

The Company Secretary's Responsibilities regarding this issue.

- Keeping the Board updated about data protection responsibilities, risks andissues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection guidance and advice for all Board members and those included in thispolicy, as necessary.
- Maintaining and administering the policy
- Responding to individuals such as Members and Suppliers who wish to know what data is being held on them by the Company
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing such as IT providers, accountants, etc.
- Ensuringallsystems,services,softwareandequipmentmeetacceptable securitystandards
- Approving data protection statements attached to emails, contract documents, etc as necessary.

The processing of all data must be:

- Necessary to deliver services to Members
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine data processingactivities related to the sale and processing of hops, their testing and transport.

The Company's Terms of Business include a Privacy Notice on data protection.

The notice:

- Sets out the purposes for which we hold personal data
- Highlights that our business may require us to give information to third parties.
- Providesthatcustomershavearightofaccesstothepersonaldatathat we hold aboutthem

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We willnotprocesspersonaldataobtainedforonepurposeforanyunconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them.

Your personal data

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Company Secretary so that the data can be updated in the records.

Data security

We must keep personal data secure against loss or misuse.

Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot accessit
- Printed data should be shredded when it is no longerneeded
- Data stored on a computer should be protected by strong passwords that are changedregularly
- Data stored on CDs or memory sticks must be locked away securely when they are not beingused
- The Company Secretarymust approve any cloud service used to storedata
- Datashouldberegularlybackedupinlinewiththecompany'sbackup procedures
- Personal datashouldneverbesaveddirectlytomobiledevicessuchaslaptops, tablets orsmartphones
- All servers containing sensitive data must be approved and protected by security software and strongfirewall.

Data retention

We must not retain personal data for no longer than is necessary. What is necessarywilldependonthecircumstancesofeachcase,takingintoaccount the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retentionguidelines.

## Subject access requests

Please note that under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them. This requirement is included in the GDPR 2018 and is expected to be included in the DPA 2018Act.

Subject access requests from Members or Officers should be referred immediately to the Company Secretary

Please contact the Company Secretary if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.

Processing data in accordance with the individual's rights

We will abide by any request from an individual not to use their personal data for direct marketing purposes

# GDPR 2018 provisions

Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

## Privacy Notice - transparency of data protection

Beingtransparentandprovidingaccessibleinformationtoindividualsabout how we will use their personal data is important to the Company. The following are details on how we collect data and what we will do withit:

| **What information is being collected?** | **Full Name, address, telephone and email contacts, Bank account details. Crop varieties, areas and quantities. Prices. Spray records** |
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| Who is collecting it? | The Company Administrator |
| How is it collected? | By direct contact with the member, customer, etc |
| Why is it being collected? | To enable the cooperative to conduct its business |
| How will it be used? | To raise invoices, pay bills, collect statistics and in other matters concerned with the conduct of day to day business. |
| Who will it be shared with? | As necessary and only to enable routine business to be conducted |
| Identity of individual responsible for policy, and general admin. | Company Secretary - Mr J F Pudge<br>Company Administrator – Ms N Lonergan |

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|---|---|
| Details of transfers to third country and safeguards | Documentation to enable sale of hops to third countries. |
| | |

Consent

Thedatathatwecollectissubjecttoactiveconsentbythedatasubject.This consent can be revoked at anytime.

Data portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Privacy by design and default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The Board will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan. When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

International data transfers

No data may be transferred outside of the EEA without first discussing it withtheSales Director and/or the Company Secretary.Specificconsentfromthedatasubjectmust be obtained prior to transferring their data outside theEEA. The lead supervisory authority is in the UK.

Data audit and register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

Reporting breaches

All Officers have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps ifnecessary
- Maintain a register of compliancefailures
- NotifytheInformationCommissioner'sOffice(ICO)ofanycompliance failures that are material either in their own right or as part of a

pattern offailures

Monitoring

Everyone must observe this policy. The Company Secretary has overall responsibility for this policy. He will monitor it regularly to make sure it is being adhered to.

## Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and the Company at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action.

If you have any questions or concerns about this policy, contact the Company Secretary.