

## PRIVACY AND COOKIES POLICY

Welcome to our privacy and cookies policy. Organic Milk Suppliers Co-Operative Limited (registered with company number 03388324, trading as Organic Herd ("**Organic Herd**", "**we**", "**our**", "**us**") are committed to protecting your personal data and respecting your privacy. For the purposes of the UK GDPR, we are the controller of and are responsible for your personal data. We are registered as a controller with the Information Commissioner's Office (ICO) and our registration number is Z6442312.

Our privacy policy relates to our use of any personal information you provide to us by phone, SMS, email or other electronic means, in letters and other correspondence and in person. Our cookies policy is found at the end of this document.

Organic Herd is a farmer-run and farmer-owned collective of organic dairy farmers, who together form the UK's largest dedicated organic dairy supplier base. We market and distribute an extensive range of standard and premium organic dairy products in the UK and abroad. We are committed to protecting your personal information when you are using our services, visiting our website or otherwise communicating with us.

This privacy policy relates to our use of any personal information that we collect from you when using our website and services, including our members-only portal. Those users with access to our members-only portal shall be referred to as "**Members**". You can browse our website without disclosing your personal data, however, please refer to our cookies policy for more information on how we collect cookies.

## PURPOSE OF THIS PRIVACY POLICY

This privacy policy explains the following:

- What information Organic Herd may collect about you;
- How Organic Herd will use information we collect about you;
- When Organic Herd may use your details to contact you;
- Whether Organic Herd will disclose your details to anyone else;
- Your choices regarding the personal information you provide to us.

Organic Herd is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the UK General Data Protection Regulations ("**UK GDPR**") and the Data Protection Act 2018.

Please read this privacy policy together with any other privacy policy or fair processing policy we may provide when we are collecting or processing your personal data so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## INFORMATION WE MAY COLLECT ABOUT YOU

Personal data means any information about an individual from which a person can be identified either directly or indirectly. It does not include data which does not relate to an identified or identifiable individual (anonymous data).

We **may** collect, use, store and process the following data about you:

- **Identity Data** which includes your first name, last name, username or similar identifier;

- **Contact Data** which includes your personal address, business address, personal email address and business email address, personal telephone number and business telephone number;
- **Technical Data** which includes your internet protocol (IP) address; login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- **Profile Data** which includes your username, preferences, feedback, survey responses and photographs submitted by you to us or through our members-only portal; and
- **Usage Data** which includes information about how you use our website and services.

We may collect and use **Aggregated Technical Data** for the purpose of understanding how users use our website. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. We do not collect any **Special Categories of Personal Data** about you (such as information relating to your race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We also do not collect any information about criminal convictions and offences.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may provide us with Identity, Contact and Profile data by filling in forms, signing up to our members-only portal or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - use our services;
  - create an account on our website, including where appropriate, our members-only portal;
  - provide survey responses;
  - give us feedback; and/or
  - contact us.
- **Cookies.** Our website uses cookies to collect Technical Data and distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For more information on the cookies we use and how to update your cookie preferences, please refer to our Cookies Policy.
- **Third parties.** We will also receive Technical Data from analytics providers.

## HOW WE USE YOUR PERSONAL DATA

We will only process your personal data when there is a lawful basis for doing so. Usually, we will process your personal data in the following circumstances:

- where you have provided us with your consent;
- where the processing is necessary for us to fulfil a contract with you;
- 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; or
- where we need to comply with a legal obligation.

## PURPOSES FOR PROCESSING YOUR PERSONAL DATA

We have set out in the table below, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. 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 using the details provided at the end of this privacy policy if you would like further 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>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To provide the services that we contract with you to provide	(a) Identity (b) Contact (c) Profile	Performance of a contract with you.
To register Members with an account	(a) Identity (b) Contact (c) Profile	Performance of a contract with you.
To manage our relationship with you, which will include:  (a) notifying you about changes to our website, terms of use or privacy policy;  (b) responding to your queries, requests and complaints.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you;  (b) Necessary for our legitimate interests (to communicate with you and manage our relationship with you); and  (c) Necessary to comply with a legal obligation.
To enable Members to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you; and  (b) Necessary for our legitimate interests (to study how Members operate and to develop and grow our cooperative).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); and  (b) Necessary to comply with a legal obligation.
To improve our website, services, Member relationships and experiences	(a) Technical (b) Usage (c) Profile	Necessary for our legitimate interests (to define types of Members, to keep our website updated and relevant and to develop our business).
For research, data analysis, statistical, survey and benchmarking purposes and to market and promote our business.	(a) Identity (b) Contact (c) Profile (d) Usage	Necessary for our legitimate interest to fulfil our obligations to promote Organic Herd, its Members and organic practices. Personal data collected for this purpose will be anonymised and aggregated before publishing internally and / or externally. Individual Member data will be visible only to

		Organic Herd and our sub-processors (if any and where necessary).
To establish, exercise and defend our legal rights	(a) Identity (b) Contact (c) Profile (d) Usage	Necessary to comply with a legal obligation.  Necessary for our legitimate interest (for the purpose of establishing, exercising or defending our legal rights).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide the personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the personal data is collected.

## DIRECT MARKETING

We obtain consent to send marketing emails (save for in respect of business-to-business marketing). We offer regular emails and bulletins to let you know about Organic Herd news and services. We may personalise the message content based upon any information you have provided to us previously and your business type.

You can opt-out of receiving marketing emails at any time by following the unsubscribe link in any marketing emails sent to you or by contacting us at [\[insert appropriate contact\]](#). If you opt-out of receiving marketing communications, you will still receive service-related communications that are necessary for administrative or service purposes (for example, updates to our terms or this privacy policy).

## DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the third parties set out below for the purposes set out in the table above:

- other companies in the Organic Herd Group;
- specific third parties such as our website developer, Quantock, for our external-facing Sites and GSL Media for our members-only portal Sites;
- our professional advisors;
- third parties to whom we may choose to sell or transfer parts of our business or our assets; and
- third parties who we may seek to acquire or merge with.

We may also need to disclose or share your personal data with regulators and other authorities where we are under a legal or regulatory obligation to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers (where acting as processors on our behalf) 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.

## **INAPPROPRIATE CONTENT SENT TO US**

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to Organic Herd websites, social media or communications channels, Organic Herd may remove such content without your consent and without any prior notice being given to you.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you will be stored in the UK and Ireland, which will involve transferring your personal data outside of the UK to Ireland.

For these transfers, we rely on the safeguard that Ireland (as part of the EEA) has been deemed to provide an adequate level of protection for personal data by the United Kingdom Government.

## **DATA SECURITY**

We acknowledge your trust and are committed to protecting the information you provide to us. To prevent unauthorised access, maintain accuracy, and ensure proper use of information, we have employed physical, electronic, and managerial processes to safeguard and secure the information we collect online. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered or disclosed or used or accessed in an unauthorised way. All those who have access to and are associated with the processing of personal data are obliged to respect the confidentiality of personal details collected and used by us.

Unfortunately, the transmission of your personal data via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. These parties will only process your personal data on our instructions (where acting as a processor on our behalf) and are subject to a duty of confidentiality.

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

## **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

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, regulatory, tax, accounting or other requirements.

You can ask us to delete your data in certain circumstances. This is explained further below in relation to your rights as a data subject.

## **YOUR RIGHTS AS A DATA SUBJECT**

Under certain circumstances, the UK GDPR conveys the following rights to you as a data subject in relation to your personal data:

- the right to access your personal data held by us;
- the right to request that we correct any inaccurate data held by us (note that we may need to verify the accuracy of any new data you provide to us);
- the right to request the erasure of personal data held by us (in certain circumstances);
- the right to object to the processing of your personal data by us (in certain circumstances);
- the right to request a restriction on the processing of your personal data by us (in certain circumstances);
- the right to request a copy of your personal data in a commonly used electronic format for the purposes of transferring it to another data controller (in certain circumstances);
- the right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect; and
- the right to withdraw consent (where we are relying on consent to process your data). If you withdraw your consent, this will not affect the lawfulness of processing based on consent before its withdrawal.

You can find out more about these rights on the ICO website or by contacting us.

If you wish to exercise any of the rights set out above, please contact us. We will aim to provide you with a response within 30 days from the date of receipt of your request. Occasionally, it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you of the delay and keep you updated.

We may require you to confirm your identity prior to responding to any request received and where your identity cannot be verified, we will reject your request.

## **CAN I FIND OUT WHAT DATA ORGANIC HERD HOLDS ABOUT ME?**

As set out above, you have the right to request a copy of the personal information Organic Herd holds about you and to have any inaccuracies corrected or your data deleted. We require you to prove your identity with two pieces of approved identification. Please address requests and questions to the DPO using the contact details shown at the end of this policy.

We will need two copies of forms of identification, which can be any of the following:

- passport;
- driving licence;
- birth certificate;
- utility bill (from the last 3 months);
- current vehicle registration document; or
- bank statement (from the last 3 months).

## **THIRD PARTY LINKS**

This website and our members-only portal may, from time to time, contain links to websites owned and operated by third parties. If you follow a link to any of these websites, this may enable third parties to collect or share data about you. Please note that we do not control these third-party websites. These websites should have their own privacy policies and we do

not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## COOKIES POLICY

This website, [www.organicherd.co.uk](http://www.organicherd.co.uk), <https://britishorganicdairyco.com/>, <https://grassrootsdairyco.uk/> and <https://kingdomcheddar.com/> and our members-only portal use cookies to distinguish you from other users of our website and our members-only portal respectively.

### WHAT ARE COOKIES?

Cookies are small text files that are placed on your device by websites that you visit and can be thought of as an internet user's identification card, which tells a website when the user has used it and when they return.

Cookies make the interaction between users and websites faster and easier. Without cookies, it would be very difficult for a web site to remember the user's preferences or registration details for a future visit.

General information on deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

### WHAT COOKIES DO WE USE?

**Strictly Necessary Cookies:** These cookies are always enabled as without them, our website won't work properly. We do not need to obtain your consent to use this type of cookie.

The specific cookies and the purposes we use them for are shown in the table below:

<b>Cookie</b>	<b>Purpose</b>	<b>Duration</b>
<b>NECESSARY COOKIE:</b> last_visited_url	This is an essential cookie used to store data about your visit to our website and any choices you make or data you enter.	Dependant of users browser settings
<b>NECESSARY COOKIE:</b> lscache_vary	This is an essential cookie that is created when an individual logs into our website and informs the server of the identity of the logged in user on each occasion.	Dependant of users browser settings

## **CHANGES TO OUR PRIVACY AND COOKIES POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

This Privacy Notice and Cookies Policy may be updated from time to time, so you may wish to check it each time you submit personal information to Organic Herd. The date of the most recent revisions will appear on the top of this page. If material changes are made to the Privacy Notice and Cookies Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Notice changes).

Please keep us informed if your personal data changes during your relationship with us. For users who have access to our members-only portal, it is your responsibility to ensure personal data you provide to us is kept up to date and accurate. In the event you need to update your information, you should request such an update via the members-only portal.

## **CONTACT**

If you have any comments or questions about this privacy and / or our cookies policy, including any requests to exercise your rights, please contact our data protection officer using the details set out below.

Email: [dataprotection@organicherd.co.uk](mailto:dataprotection@organicherd.co.uk)

Post:           FAO: Data Protection Officer  
Organic Milk Suppliers Co-Operative Limited  
501 Parkway  
Worle  
BS22 6WA

You have the right to make a complaint at any time to the ICO, the UK regulator for data protection ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do contact us in the first instance.