

## **Our Privacy Policy**

EC Drummond Group (“**EC Drummond**” or “**We**”), are an agri business and we provide food produce across a number of different areas, as indicated on our website.

Our registered address is

The Homme,  
Hom Green,  
Ross on Wye,  
Herefordshire, HR9 7TF.

Our company registration number is 00715017.

Telephone: 01989 764328

Email: [info@ecdummond.co.uk](mailto:info@ecdummond.co.uk)

We are committed to ensuring the privacy of our employees, clients, contractors and suppliers. In this policy we explain how we hold, process and retain your personal data.

### **Information**

Personal information refers to any information that identifies or can be used to identify you. We may collect information about employees, workers and contractors in a variety of ways either directly or indirectly. Information can be collected through the recruitment process either directly from you or from a 3<sup>rd</sup> party, such as a recruitment agency. We may also collect personal information from other external parties, such as references from former employers, information from background check providers, information from credit reference agencies and criminal record checks from the Disclosing and Barring Service (DBS).

Information will also be collected while you work for the Company. This may be through your work-related activities. Whilst some of the personal information you provide to us is mandatory and/or is a statutory or contractual requirement, some of it may be asked to provide us on a voluntary basis. Information collected would include, but not limited to your full name, email address, contact telephone number.

Most of the information we process is provided to us directly by you and this includes:

- Your name, address and contact details, including email address and telephone number;
- Bank details
- Emergency Contact details
- Details of your qualifications, skills, experience and employment history;
- Information about your entitlement to work in the UK;
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- Medical details
- Criminal record disclosures

The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Data will be stored in a range of different places, including on your application record, in HR management systems, specific Software (SAGE) and on other IT systems (including email).

### **Website**

When you contact us through our website the information we collect may include your name, address, email address and contact telephone number along with an message that you provide. However, we may process data about your use of our website. The website data may include your IP address, geographical location, browser type and version, time zone setting, browser plug-in types, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This data may be obtained through analytics and would be processed for analysing the use of the website and any services.

### **Transfers of your personal data outside of the European Economic Area**

Your personal data may be transferred and stored outside of the EEA. It will also be processed by staff of our suppliers operating outside of the EEA.

Where your personal data is transferred outside of the EEA, we will ensure that either (a) The European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

### **Retaining and deleting personal data**

We review our retention periods regarding the holding of personal data on a regular basis. Personal data shall not be kept for any longer than is necessary for the purposes of the business.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your interests or the interests of another natural person.

### **Your rights**

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may where required withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

The rights you have under data protection law are:

(a) the right to access; You have the right to ask us for copies of your personal information.

(b) the right to rectification; You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

(c) the right to erasure; You have the right to ask us to erase your personal information in certain circumstances.

(d) the right to restrict processing; You have the right to ask us to restrict the processing of your personal information in certain circumstances.

(e) the right to object to processing; you have the right to object to the processing of your personal information in certain circumstances.

(f) the right to data portability; You have the right to ask that we transfer the personal information that you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charges for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at the address, email or telephone number indicated above.

### **Access to your information**

Your information will never be sold to any third parties. We will not share your information with any organisation involved in marketing data information.

### **Third Parties**

We will 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 legitimate interest in doing so.

### **Transferring personal information outside the European Economic Area**

We will not transfer your personal information to countries outside of the European Economic Area (EEA). However, if there is a requirement to transfer your personal information outside the EEA then we will write to you to explain why we need to do this and will look to ensure you can expect a similar degree of protection in respect of your personal information.

### **Data Security**

We have put in place appropriate measures to protect the security of your information.

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.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are lawfully required to do so.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Withdrawing Consent**

Where you have provided 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. To withdraw your consent, please contact the HR Manager. 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.

### **Complaints**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@ecdummond.co.uk](mailto:info@ecdummond.co.uk).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

### **Changes to this Privacy Notice**

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

### **Queries**

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR Manager ([hrsupport@ecdummond.co.uk](mailto:hrsupport@ecdummond.co.uk)).