

Privacy Notice - John M Munro Ltd.

Welcome to our privacy notice.

This notice provides information on how we may collect and process your personal data when you (for example), become a customer or supplier of ours.

You may wish to read this privacy notice, which contains information about our data processing.

1. Important information and who we are

As a possible controller, of certain personal data of yours, we have certain responsibilities.

We have appointed a data privacy manager and, if you have any questions about this privacy notice and/or our data protection practices, please contact the data privacy manager (below).

CONTACT DETAILS

Full name of legal entity: John M Munro Limited

Title of data privacy manager: Head of Administration

Email address: scotchbeef@munrodingwall.co.uk

Postal address: John M Munro Ltd, West End, Dingwall IV15 9QF

Third-party links

Our website does not include links to third-party websites, plug-ins and applications. We also do not use “cookies” with our website. Our Facebook page will not contain such links either and no personal data is collected (or stored) there.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you. Such information will generally be restricted to certain identity and contact information but may also include certain financial information (of regular customers and suppliers). We do not usually hold special category data about any suppliers or customers (or any other non-staff member to which this notice may apply).

3. How we use your personal data

Customers and Suppliers

We will only use your personal data for the purpose for which we collected it and in order to manage the customer, or supplier, relationship which may exist. The principal purpose for collecting and using such personal data is (more specifically) either, *preparatory toward entering into a contract with you or the performance/compliance of such contract thereafter*.

We may otherwise (but less frequently) use your personal data where it is in our legitimate interests to so - but only where such interests are not outweighed by any of your own. With specific reference to suppliers, we may use your personal data where we need to comply with a legal, or regulatory, obligation.

You may also receive Email marketing communications from us (in respect of our own products and services), but only if you have requested contact of this nature. You can unsubscribe to such communications at any time.

Prospective Staff Members

If you apply to work for us we may use any contact details provided to (for example) effectively communicate with you. If you are unsuccessful in obtaining a post we may retain your CV, for a period of 3 months, to keep you up to date with any further opportunities. Should you be successful in obtaining work with us, you would be covered by our separate staff privacy notice. Our basis for collecting and using such information being either, preparatory toward contract or because it is in our legitimate interest (not outweighed by your own). To the extent such documentation may include special category data, we shall also comply with any additional obligations in connection with this. We shall not share any data of a prospective staff member.

4. Any sharing of personal data

We share the personal data of customers, with any business who may be acting for us, if required on a debt recovery basis. This is to allow us to properly effect compliance with the terms of our contract with you, or because it is otherwise in our legitimate interest (not outweighed by your own). Further information, on such relevant service provider, can be obtained from our data privacy manager.

We have been provided with assurances from our current provider, that they shall treat your information (for example) securely and only in accordance with our express instructions. They have also assured us that any sub-contractor they may use shall also securely handle your information and only in accordance with the specific purposes in which the main contractor was engaged.

We use WIX to operate our customer marketing Email system, and therefore share certain personal data with them for this purpose only. We are happy with the level of security offered by them and they shall not share any of your information with others. Their privacy notice can be found on their website. There are no other relevant third-party contractors/entities currently engaged. We are otherwise only able to process/share the personal data of customers, without your knowledge or consent, where this is required or permitted by law.

The personal data of suppliers may be shared with outside agencies but only where there is a legal, or regulatory, requirement for us to do so.

5. International transfers, automated decision making and data security

We shall not transfer your personal data outside the European Economic Area (**EEA**) and will advise you if this position may change.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees who have a need to know. They will only process your personal data, as instructed by us, and they 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.

We do not perform any automated decision making.

6. Data retention

How long will you use my personal data for?

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available from our data privacy manager.

7. Your legal rights

Under certain circumstances, you have certain rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please contact our data privacy manager.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request").

Request correction of the personal data that we hold about you.

Request erasure of your personal data.

Object to processing of your personal data under certain circumstances.

Request restriction of processing of your personal data.

Request the transfer of your personal data to you or to a third party.

Withdraw consent at any time where we are relying on consent to process your personal data.

Updated, April 2019.