



AF Biomass Limited's Privacy Policy

Anglia Farmers Limited and all its wholly owned subsidiary companies (collectively known as "The AF Group") are committed to protecting and respecting your privacy. AF Biomass Limited is a wholly owned subsidiary of Anglia Farmers Limited.

This Policy sets out the basis on which AF Biomass Limited ("We" or "Us") collect personal data from you and the way in which it will be processed by us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the relevant data protection legislation, the "controller" (or "data controller") is AF Biomass Limited of Honingham Thorpe, Colton, Norwich, Norfolk, NR9 5BZ. Questions, comments and requests regarding this Policy are welcomed and should be addressed to ops@theafgroup.co.uk.

1: Why we collect your information

We collect different types of information about you for the following reasons:

1. To take specific steps necessary to enter into a contract with you.
2. To carry out our obligations arising from any contracts entered into between you and us.
3. For our legitimate interests, in order to manage and / or administer your account, unless any of those legitimate interests are overridden by any of your interests or fundamental rights and freedoms.

2: When we collect your information

We collect information from you when:

1. You sign a contract with us.
2. We speak to you over the phone in the process of managing your account.
3. We communicate with you via email in the process of managing your account.

3: The types of personal data we collect

In order to enter into a contract with you, the minimum information we require is your full business trading title, a contact name, address, telephone number and email address. If you are a supplier to us we will also require your bank account details in order to pay you.

Very occasionally, when selling goods to a customer outside of The AF Group, we may ask for trade references to ensure that you are able to meet your liabilities to us under the contract.

To ensure we comply with our legal obligations, we may also collect personal data for our health and safety records, and also when completing risk assessments, or when you provide us with a risk assessment. We may also ask you to provide machine operator certificates to ensure your ability to perform tasks necessary under a contract, for example, a forklift operator certificate.

4: How we use the data collected



In order to meet our obligations under a contract, we may use your data in the following ways:

- To provide you with goods and services, which includes managing the collection and delivery of goods, and managing any contracting services provided by us or on our behalf.
- To manage your customer, supplier or contactor account and to keep accurate records of collections, deliveries and services provided.
- To contact you regarding your contract, for example, to liaise with you to arrange collection or delivery of goods, or to provide services as set out in the contract.
- To pay you for the goods and / or services provided to us.

For our legitimate interests, we may also use your data to;

- Manage / administer your account.

If we need to process your personal data for a reason which is not outlined above, we shall contact you in order to obtain your prior consent for such use.

5: When we will share your personal data

We will share your personal data with the following third parties for the reasons stated below:

- Your contact and address information will be shared with our selected third party customers, suppliers and contractors where necessary to fulfil and manage the contract. Some examples of when we may share your data are listed below – this is not an exhaustive list;
 - If you have requested baling services from us, your address and contact information will be provided to the baling contractor in order for them to liaise with you to provide this service.
 - If we need to arrange collection of your straw we may pass your contact information and address to the allocated haulier in order for them to facilitate this collection.
- Redshelf Ltd T/A InTouch Systems, 36 Hurricane Way, Norwich, Norfolk, NR6 6HU for back up and disaster recovery purposes.
- Very rarely, we may pass customer information to credit reference agencies, for example Creditsafe, in order to verify your identity and assess your credit score to ensure you are able to meet your obligations to us under a contract.
- Your personal data may be shared between the AF Group of companies and its' employees in order to facilitate the management and administration of your account.

Where we pass your personal information to our selected third parties (suppliers, customers and contractors), we will only provide the information that is necessary to deliver the service or perform the obligations in the contract. We have a contract in place with our selected third parties that requires them to keep your information secure and not to use it for their own direct marketing purposes. You can request a current list of our selected third parties by contacting ops@theafgroup.co.uk.

We also record all calls made to and from the office landline numbers. Access to a recorded call will only be given when the request has been approved by at least two senior managers



and when there is a valid reason for needing to access the call recording. We process this data for our legitimate interests for;

AF Biomass Limited will never sell your personal data or pass it to any other third parties without your consent.

We reserve the right to disclose or share your personal data in order to comply with any legal requirements, enforce the terms and conditions in our contract, or any other agreement we enter into with you, or to protect the rights, property, or safety of our business and other customers, suppliers and contractors. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6: Where we store your personal data

All of the personal data that you provide to us is stored on our secure servers located at our head office. We use our best endeavours to ensure that your data is held securely and in accordance with this privacy policy.

Offsite backups are securely held by InTouch Systems as part of our disaster recovery plan, to ensure that we can get back up and running quickly in the event of a disaster.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data when it is being transmitted to us. Any transmission is at your own risk. Once we have received your information, we will use strict safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

7: How long we retain your personal data for

We will keep your data for the period of time you are in contract with us or we are in contract with you, and then for seven years (or as long as legally required) after the end of the contract.

Call recordings will be retained for a maximum of six months.

8: Your rights

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at ops@theafgroup.co.uk.

We will endeavour to comply with any request made within one month from the date of your request. However, we may extend this date to two months if the request is excessive or of a repetitive nature. If we need more than one month to meet your request we will let you know.

Please note that where we receive requests under this section which are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

1. Charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
2. Refuse to act on the request.



8.1: Right to access / access request

You have the right to request access to the information that we hold on you. In order to protect your information, we may take reasonable steps to verify your identity before we can hand over your data.

8.2: Right to rectification

You have the right to ask us to update any personal information that is incomplete or inaccurate. We will endeavour to ensure that if we update your information, we will pass this onto our selected third parties, including suppliers, customers and contractors.

8.3: Right to erasure / right to be forgotten

You have the right to ask us to delete your personal data if;

- The personal data is no longer necessary for the purpose which we originally collected or processed it for.
- You object to the processing of your data and there is no overriding legitimate interest for us to continue this processing.
- We have processed the data unlawfully.
- We have to in order to comply with a legal obligation.

8.4: Right to restrict processing

You have the right to ask us to restrict or suppress the processing of your personal data if;

- You have previously informed us that the data is inaccurate.
- We no longer require the data for its original purpose, but we need to hold it, or you ask us to retain the information to comply with legal obligations.
- We have processed the data unlawfully.
- We are in the process of deleting your data.

We will endeavour to ensure that where you have asked us to restrict the processing of your data, we will inform our selected third parties, including suppliers, customers and contractors accordingly.

8.5: Right to data portability

You have the right to receive a copy of your data in a commonly used machine-readable format for transfer to another controller, provided the data was processed for the purpose of a contract between us and the processing is being carried out by automated means.



This will allow you to move, copy or transfer personal data easily from one IT environment to another. Alternatively, we can transmit such data directly to another organisation. Please note that we will not be able to comply with a data portability request if this will affect the rights and freedoms of others.

8.6: Right to object

You have the right to restrict processing based on legitimate interests. If you exercise your right to object, we will stop processing your personal data unless;

- We are able to demonstrate compelling legitimate grounds for the processing.
- The processing is for the establishment, exercise or defence of a legal claim.

9: What to do if you are not happy with how we process your data

If you consider that we are in breach of our obligations under the GDPR you have the right to complain to the Information Commissioner's Office (ICO).

10: Review of this policy

We keep this policy under regular review. This policy was last updated on 14/05/2018.