

## PRIVACY NOTICE

Dawn Meats “hereafter referred to as “the Company” or “the Business” is committed to protecting your personal data when we trade with you, or process your information for any reason. This privacy notice explains how the Company uses information about you and how we protect your privacy. The processing of personal data is governed by the General Data Protection Regulations 2016 (GDPR) and the Data Protection Act 2018 (DPA). Personal data refers to any information with which a living individual can be identified. Individual identification can be by the information alone or in conjunction with other information in the possession of the Company.

### The data we may collect about you.

Categories of Personal Data	Example
Individual details/Personal data	Name, address, other contact details (e.g., email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, family details including their relationship to you.
Special category (sensitive) personal data. This group have been given additional protection under data protection laws.	The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric or data concerning sex life or sexual orientation. Surveillance or CCTV information.

To conduct our business effectively, we may need to collect information from farmers that we purchase livestock from, individuals visiting our premises or website, customers, suppliers, employees and potential employees. These include personal data such as:

- **Identity Data** includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Farm Specific Data** includes herd number, flock number, CPH number, veterinarian details, feed supplier details, breed society registration details, sire details, assurance scheme details and agent’s details.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers and fax numbers.

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- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your 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 and Usage Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Contact, Financial and Transaction Data** from hauliers or other intermediaries who may act as a go between in our transaction with you to purchase your livestock.
- **Identity and Contact Data** from data brokers or aggregators such as HMRC, DWP, BCMS, BOVIS, APHIS, Breed Society based inside the EU and Red Tractor.

Special category data that we process include:

- **Site security** includes [CCTV images of people on site, photos for use in promotional material on and offline.
- **Others** might include [religious belief or ethnicity] - We do not specifically request information on religious belief or ethnicity but based on you providing information such as dietary requirements it may on occasion result in processing such information.

### **Why we collect your personal information**

- To manage our business contract and incidental arrangements
- To demonstrate compliance with traceability and food standards requirements through sharing appropriate supply chain and employee information.
- To support the marketing of meat pertaining to specific locations or other marketable traits.
- To be able to respond to correspondences generated via post, our website or email.
- For recruitment and employment purposes within the Group
- For purposes of legal claims that may arise.
- For security purposes and the protection of our properties and investments.

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## **Where might we collect your personal data from?**

- You, your representatives or associates.
- Your employees, agents, businesses, etc.
- Other organisations such as companies who you have given permission to share your information.

## **Legal basis for processing your personal data.**

We have the right to process your personal data if at least one of the following applies:

- Processing is necessary for carrying out our contractual obligations with suppliers, farmers, employees, etc.
- In compliance with our statutory obligations under food, health and safety and other regulations.
- Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, prevention of fraud and in the context of a business reorganisation.
- Explicit consent of the data subject

## **How do we keep your information secure?**

We are committed to ensuring that your personal data is safe. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, technical, electronic and managerial procedures to safeguard and secure the information that we hold about you. These include:

- Secure work areas and sending emails securely.
- Information security awareness for our staff.
- Role based access controls to personal data and password management.
- Encryption of personal data,
- Testing, assessing and evaluating the effectiveness of technical security controls.
- Disaster Recovery and Business Continuity arrangements

## **How long will we keep your personal data for?**

Your personal data will be held in line with our Group Retention Schedule. This can be requested by contacting us if necessary.

In line with current data protection legislations, your information will not be held for longer than necessary.

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### **Who will we share your personal information with?**

We may engage the services of commercial companies to store and manage your information on our behalf. Where we have these arrangements, there is always a contract, memorandum of understanding or an information sharing agreement in place to ensure that the legal requirements for handling personal data are met. We may also share personal data under the following circumstances:

- Where required by law, we will share your personal data with government agencies such as HMRC, DWP
- Where necessary, we will share your personal information with third parties as part of requirements to demonstrate compliance with traceability, food safety and other relevant business standards.
- Subsidiaries and/or holding companies that are connected to the Company in the UK and/or EEA for the provision of IT, system administration services and for reporting purposes.
- We may share personal data to academic institutions for statistical and research purposes
- Professional advisers such as lawyers, bankers, auditors and insurers who provide specialist services for the effective running of our business.

### **How can you access the information we hold about you?**

You have the right to request all the information we hold about you when we receive a request from you in writing. We would normally give you access to everything we have recorded about you. This applies to paper and electronic records. However, we will not share any parts of your details which contain:

- Confidential information about other people or
- If it is in the interest of public safety and security to withhold that information from you.

### **Your rights and your personal data.**

Subject to an exemption under the GDPR 2016 and the DPA 2018, you have the following rights with respect to your personal data:

- ❖ The right to request a copy of your personal data which the Company holds about you.
- ❖ The right to request that the Company corrects any personal information if it is found to be inaccurate or out of date.
- ❖ The right to erasure of your personal data where it is no longer necessary for the Company to retain such data.

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- ❖ The right to withdraw consent to the processing of your data at any time.
- ❖ The right to request that the Business to transmit your data another organisation where applicable.
- ❖ Where there is a dispute in relation to the accuracy or processing of your personal data, you have the right to request a restriction is placed on further processing.
- ❖ The right to object to the processing of personal data where applicable.
- ❖ The right to lodge a complaint with the Information Commissioners Office.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact our Data Protection Officer on [GDPR@dawnmeats.com](mailto:GDPR@dawnmeats.com) Or Grannagh, Co. Waterford, X91 HRR3.

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Irish Data Protection Supervisory Authority. In the Republic of Ireland, the Office of the Data Protection Commissioner can be contacted at: 21 Fitzwilliam Square South Dublin 2 D02 RD28, Ireland. 21 Fitzwilliam Square South, Dublin 2. D02 RD28, Telephone 076 110 4800 / 057 868 4800, E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

In the United Kingdom, you can complain to Head office. Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF. Tel: 0303 123 1113, Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)

### **Cookies for online users**

To make this site simpler, we sometimes place small data files on your computer. These are known as cookies. They improve things by:

- Remembering settings, so you do not have to keep re-entering them whenever you visit a new page
- Remembering information, you have given so you do not need to keep remembering it.
- Measuring how you use the website so we can make sure it meets your needs.

By using our website, you agree that we can place these types of cookies on your device. Cookies are not used to identify you personally. They are just here to make the site work better for you. You can manage and/or delete these small files as you wish.

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