



# PRIVACY POLICY

## PRIVACY POLICY

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### PRIVACY POLICY FOR TRADE CUSTOMERS, SUPPLIERS, OTHER BUSINESSES, AND THEIR EMPLOYEES

Harrowden Turf Limited ('we', 'the Company', 'our' or 'us', as applicable) is committed to protecting and respecting the privacy of its customers and suppliers. This policy (together with any other documents we refer to in this policy) contains the terms that set out how we use personal information and with whom it is be shared. Please read the following carefully.

This policy covers our relationships with trade customers, other businesses and their employees. We make this distinction as separate privacy policies apply to our own employees and consumers. Our Privacy Policy for consumers is available on request and at [turfonline.co.uk/privacy-policy](https://turfonline.co.uk/privacy-policy).

Any changes we may make to our Privacy Policy in the future will be posted on our website at [harrowdenturf.co.uk](https://harrowdenturf.co.uk) and, where appropriate, notified to you by email.

Our website, and those of our other brands and group companies, may have separate privacy policies and terms which apply to their use. Any personal data you provide or collected through your use of those websites are not covered by this privacy policy.

#### 1. Who are we?

1.1. Harrowden Turf Limited (Company Number 09297147) is the data controller in relation to the processing activities described below. This means that Harrowden Turf Limited decides why and how your personal information is processed

#### 2. How do we collect your personal information?

Personal information you give to us

##### 2.1. You provide us with the following information:

2.1.1. any correspondence you send to us;

2.1.2. information you provide during any phone calls between you and us; and 2.1.3. any other information you might provide to us in the normal course of interactions with our business.

2.2. We are aware that your information may be confidential, and we will protect the confidentiality of your information in accordance with our normal procedures and legal requirements.

#### 3. What type of personal information do we process about you?

3.1. We may process a range of personal information about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers.





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3.2. We may process the following types of personal information about you:

CATEGORY	INFORMATION INCLUDED IN THIS CATEGORY
CONTACT	Information which can be used to address, send or otherwise communicate a message or products to you
BANKING/BILLING	Information used to send/receive funds to/from you or that appears on your bills
FRAUD	Information relating to the occurrence, investigation or prevention of fraud
LEGAL	Information relating to legal claims made by you or against you or the claims process
CARDHOLDER	Your payment card details
SALES	Information relating to the sale of products or services to you or their repair or return
CORRESPONDENCE	Information contained in any correspondence between you and us
CREDIT	Your application for credit and information relating to the provision of credit to you
MONITORING	Information relating to the surveillance or monitoring of your activities on our premises

3.3. Any personal information you provide to us is on a voluntary basis, however:

3.3.1. we will not be able to process any orders you place or fulfil other business obligations if you do not provide details which may be necessary to enter into a contract with you (such as contact details).

4. How will we use your information?

Where we have a CONTRACT:

4.1. Primarily, we will use the personal data you provide to us to fulfil our contractual obligations arising from any orders you have placed with us. We may also process the data when taking steps prior but relevant to entering into a contract, for example providing a quote.

Where you have provided CONSENT:

4.2. We may use and process your personal information where you have consented for us to do so for the following purposes:

4.2.1. to provide you with information, products or services that you request from us, or which we feel may interest you (provided of course that you agree);

4.2.2. to contact you via email with information about products and services which are similar to those we previously provided to you;



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4.3. You may withdraw your consent for us to use your information in any of these ways at any time. Please see Withdrawing your consent for further details.

Where there is a LEGITIMATE INTEREST:

4.4. We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

4.4.1. for our internal purposes, such as quality control and account administration;

4.4. We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

4.4.1. for our internal purposes, such as quality control and account administration;

4.4.2. making it easier for you to place orders or request services from us in the future;

4.4.3. network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;

4.4.4. to notify you about changes to our services or any agreements we may have with you;

4.4.5. marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same);

4.4.6. to create reports to assist with future marketing, budgeting or price setting;

4.4.7. prevention of fraud and other criminal activities;

4.4.8. to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;

4.4.9. to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request); and

4.4.10. management of queries, complaints or claims.

5. With whom will we share your information: Group companies:

5.1. We may share your information with other companies: within our group. They may use your personal information to provide you with information, products or services you request from us, or which we feel may interest you (provided of course that you agree) or in the fulfilment of other business obligations which we have with you.

5.2. The group companies with whom we may share information are set out at Schedule 1.

Our suppliers and service providers

5.3. We may disclose your information to our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf in the fulfilment of our obligations arising from any contracts with you. Such third parties may include pallet couriers and haulage contractors, or other third parties who provide services to us.

5.4. Other third-party service providers not directly involved in the fulfilment of our obligations may have access to your data for the purposes of system and software maintenance and updates.

5.5. When we use third-party service providers, we only disclose to them or allow them to access any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Credit/debit card payment processors

5.6. If you pay for an order or bill using a credit or debit card over the phone, we use Sage Pay to process your payment. We do not store your credit or debit card details for longer than is required to process a payment. Sage Pay operate secure servers to process your payment details. They encrypt your credit or debit card information and authorise payment directly. Your credit card or debit card details cannot be accessed or revealed once a transaction is complete. Please read their privacy policy at <https://www.sagepay.co.uk/policies/privacy-policy> to see what security measures they have in place and how they treat your information.





# PRIVACY POLICY/4

Credit/debit card payment processors

5.6. If you pay for an order or bill using a credit or debit card over the phone, we use Sage Pay to process your payment. We do not store your credit or debit card details for longer than is required to process a payment. Sage Pay operate secure servers to process your payment details. They encrypt your credit or debit card information and authorise payment directly. Your credit card or debit card details cannot be accessed or revealed once a transaction is complete. Please read their privacy policy at <https://www.sagepay.co.uk/policies/privacy-policy> to see what security measures they have in place and how they treat your information.

Other ways we may share your personal information

5.7. We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our employees, suppliers and customers.

5.8. However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

5.9. We may share non-personal aggregated statistics data about order volumes or patterns with third-parties.

6. Where do we store your personal information?

6.1. The information we hold about you is stored in both digital and physical records. 6.2. All information you provide to us is stored on secure servers which are located within the European Economic Area.

6.3. If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA.

7. How long do we store your personal information for?

7.1. If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

7.2. We do not retain personal information in an identifiable format for longer than is necessary.

7.3. Most personal data you provide to us is held for no longer than six years.

7.4. The only exceptions to this are where:

7.4.1. the law requires us to hold your personal information for a longer period, or delete it sooner;

7.4.2. you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Erasing your personal information or restricting its processing); and

7.4.3. in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

8. What are your rights in respect of your personal information?

8.1. You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no response is required, after we have received your request.

Accessing your personal information:

8.2. You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.



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Correcting and updating your personal information:

8.3. The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting using the details described at the end of this policy.

Withdrawing your consent:

8.4. Where we rely on your consent as the legal basis for processing your personal information, as set out under How will we use your information? you may withdraw your consent at any time by emailing [admin@harrowdenturf.co.uk](mailto:admin@harrowdenturf.co.uk). If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our Unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

Objecting to our use of your personal information:

8.5. Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under How will we use your information? you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

8.6. You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our Unsubscribe tool.

Erasing your personal information or restricting its processing:

8.7. In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request.

8.8. You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. We may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

Transferring your personal information in a structured data file:

8.9. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

8.10. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

Complaining to the UK data protection regulator:

8.11. You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details.

9. How do we keep your information secure?

9.1. Most of your information is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where any information is held about you in physical form, access to this information will be restricted to those employees of Harrowden Turf with a legitimate business reason for accessing that information.



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9.2. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted to us via electronic means and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 10. Marketing

10.1. We may collect your preferences to receive marketing information directly from us by email in the following ways:

10.1.1. if you make a sales enquiry or place an order we may contact you with marketing information in the ways mentioned in the notices presented to you, only if you indicate that you give your consent for us to do so.

10.1.2. From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.

10.1.3. If you have previously consented to our use of your personal information to provide marketing to you in any of the ways mentioned above, you have the right to opt-out at any time. Please see Withdrawing your Consent and Objecting to our use of your personal information and automated decisions made about you above for further details on how you can do this.

## 11. Changes

11.1. We may make changes to this Privacy Policy at any time by sending you an email with the modified terms or by posting a copy of them on [harrowdenturf.co.uk](http://harrowdenturf.co.uk). Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on [harrowdenturf.co.uk](http://harrowdenturf.co.uk), whichever is the earlier.

## 12. How to contact us

11.1. Questions, comments or requests concerning this Privacy Policy are welcomed and should be sent by email to [admin@harrowdenturf.co.uk](mailto:admin@harrowdenturf.co.uk).

## SCHEDULE 1

### GROUP COMPANIES

#### TURFLAND FARMS LIMITED

Company number 07048770

Registered office address: Colpmans Farm, Islip, Kettering, Northants, NN14 3LT

#### SPEARHEAD TURF LIMITED

Company number 02026433

Registered office address: Colpmans Farm, Islip, Kettering, Northants, NN14 3LT

#### SHRUBHILL FARMS LIMITED

Company number 06007452

Registered office address: Colpmans Farm, Islip, Kettering, Northants, NN14 3LT

