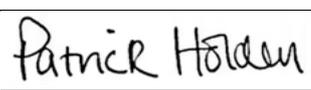
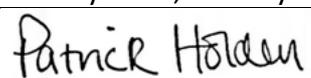


## Sustainable Food Trust – Data Protection Policy

<b>Policy prepared by:</b>	Morwenna Lewis
<b>Policy approved by CEO:</b>	Patrick Holden
<b>Signed by CEO:</b>	
<b>Became operational:</b>	July 2018
<b>Due for review:</b>	January 2021
<b>Reviewed by and on:</b>	January 2019, January 2020.
<b>Signed by CEO:</b>	

### Introduction

This privacy and cookie policy (“Policy”) describes how the Sustainable Food Trust (“Company,” “we,” “us” and “our”) collects, uses and shares personal data when using our services, including our website <http://www.sustainablefoodtrust.org/> (the “Site”). Please read the following information carefully to understand our views and practices regarding your personal data and how we will treat it.

By using our Site, attending an event, signing up to a mailing list or sharing personal information with us, you agree to the Sustainable Food Trust (SFT) using your data in accordance with the information outlined below. At the point of entry, you agree that all data you provide on behalf of yourself or an organisation you represent, is accurate to the best of your knowledge.

### Purposes of processing

#### What data do we collect?

**Identity Data** includes first name, last name, username or similar identifier, and date of birth.

**Contact Data** includes email address and telephone numbers, and mailing address.

**Technical Data** includes internet protocol (IP) address, unique Cookie ID, Device ID, 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 the Service.

**Usage Data** includes information about how you use our Site.

We do not collect any **Special Categories** of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you provide the SFT with information, it is your responsibility to check that this information is correct to the best of your knowledge and to update it, should the information change.

If you do not want us to process your information and use it as detailed in this policy, you can remove or alter your permissions at any time, as described below.

### **What is personal data?**

Some information we collect about you is personal data. As used in this Policy, “personal data” is as defined in the General Data Protection Regulation 2018 and any successor legislation. Personal data includes any information which, either alone or in combination with other information we hold about you, identifies you as an individual. This includes (but is not limited to) your name, postal address, email address and telephone number.

### **Why do we need your personal data?**

We will only process your personal data in accordance with applicable data protection and privacy laws.

*Most commonly, we use your personal data in the following circumstances:*

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent to such use.

Your consent provides us with the legal basis we require under the applicable laws to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our Site and Services.

*This information helps the SFT to:*

- Provide users with information, including a bi-monthly newsletter, articles and current updates regarding food and farming issues;
- Provide users with information about events and conferences that may be of interest;
- Enhance and improve the services and information provided;
- Analyse who accesses our services, where improvements can be made and any trends which might occur – for monitoring and future planning purposes.

## **Collecting your personal data**

On providing us with information, you will be asked to give your consent to us processing your data in ways stated within this privacy policy. If you do not consent to your data being processed in this way, we may be unable to provide the information requested. Users have the right to update their details and change their permissions at any point and the SFT wants this to be as easy as possible. To do this please follow the link at the end of the newsletter which says 'Update subscription preferences'. If you wish to unsubscribe from a mailing list or newsletter you can click the unsubscribe button at the bottom of the email.

## **Information you give us**

*This includes personal data:*

- You provide when you register to receive emails, through our Site.
- You provide when you correspond with us by phone, email or otherwise.
- You provide when signing up to an event, such as your name, contact details, and organisation;
- That may be contained in a video, photograph, comment, a job or volunteering opportunity, news article, or other content or submission you post to our website, send via email or social media;
- That may be contained in a video, photograph or other media, taken by an SFT member of staff, for example at one of our events (this will only ever be shared with your consent);

## **Information from social networking sites**

Our Site includes interfaces that allow you to connect with social networking sites (each an “SNS”). We post content on [Twitter](#), [LinkedIn](#), [YouTube](#), [Instagram](#) and [Facebook](#), and advise you check their privacy policies (which can be found using the above links). If you connect to an SNS through our Site or other Services, you authorise us to access, use and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

We monitor our SNS activity through the SNS, for example Facebook Insights and Twitter Analytics. By interacting with us on the SNS listed above you are agreeing to your social media account details being logged by these programs. They allow us to monitor individuals interacting with us and we use this information to improve our services.

## **Information we get from others**

We may also get information about you from other sources. We may add this to information in our internal CRM database system. When using these channels to communicate with the SFT, it is the user’s responsibility to read and agree to the other relevant organisation’s privacy policy.

## **Information automatically collected**

Using [Google Analytics](#), some information is automatically logged when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, pages you viewed on our site, how long you spent on a page, access times and information about your use of and actions on our Site. No personal data – which could identify you from another person – is stored via this method.

## **Cookies**

### **What are cookies?**

We collect information using Cookies. Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We use both session cookies (which expire

once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

**Cookies we use**

We use two broad categories of cookies; first-party cookies, served directly by us to your computer or mobile device, which are used only by us to recognise your computer or mobile device when it revisits our Site; and third-party cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites. Some of these cookies are essential to ensure our site works as expected. Others are non-essential cookies which anonymously track visitors to enhance your experience of our Site. You are able to disable these cookies (instructions below), but some features of our site may then be unavailable.

*Our Site uses the following types of cookies for the purposes set out below:*

<b>Cookie Type</b>	<b>Purpose</b>
<b>Essential Cookies</b>	<p>These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to carry out tasks and log in to secure areas of our Site and help the content of the pages you request load quickly. Without these cookies, you will not be able to use some features of our Site.</p>
<b>Analytics and Performance Cookies</b>	<p>These cookies are used to collect information about traffic to our Site and how users interact with our Site. This information does not identify any individual visitor, it is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site and Services more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>We use <u><a href="#">Google Analytics</a></u> to monitor this website activity and improve our services. You can find out</p>

more about how Google protects your data [here](#). You also have the right to object to Google Analytics processing your data and prevent the use by downloading this [browser plugin](#).

### **Social Media Cookies**

These cookies are used when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or LinkedIn. The social network will record that you have done this.

### **Disabling cookies**

You can remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to automatically accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site.

### **Pixel tags**

We may use pixel tags (which are also known as web beacons and clear GIFs) to track mail openings of users who are signed up to receive information via email. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. The information we collect using pixel tags is not linked to our users’ personal data.

### **Using your personal data**

*We may use your personal data as follows:*

- To operate, maintain, and improve our Site and services;
- To manage your subscriber information, including communicating with you about information, if you have signed up to an SFT mailing list;
- To respond to your comments and questions and to provide customer service;

- To send information including technical notices, updates, security alerts, and support and administrative messages;
- With your consent, to send you a bi-weekly digital newsletter containing links to articles, reports, videos and current news relating to farming and food sustainability. These may be published directly by the SFT or a third party. You may opt-out of receiving such information at any time – such emails tell you how to “opt-out”;
- With your consent, to send you promotional emails about upcoming events and conferences run by ourselves or our partners that we think may be of interest. You may opt-out of receiving such information at any time – such emails tell you how to “opt-out”;
- To send you administrative information regarding an event you have signed up to attend, and other correspondence regarding our business dealings with you;
- To link or combine user information with other personal data;
- As we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, including to respond to requests from public and government authorities, to enforce our Policy, and to protect our rights, privacy, safety or property, and/or that of you or others;
- To analyse our impact and how well we are reaching our aims;
- As described in the “Sharing of your Personal Data” section below.

## **Sharing your personal data**

*We may share your personal data as follows:*

- We may share your personal data with third parties where you have provided your consent for us to do so;
- We may share your personal data with our third party service providers who provide services such as payment processing, information technology and related infrastructure provision. These third parties are:
  - [123 reg](#) (who provide our email and web hosting service)
  - [Mailchimp](#) (where our subscriber lists and email templates are stored)
  - [Marketcircle Inc. trading as Daylite](#) (CRM system we use for storing business contacts and tracking the history of our relationships)
  - [Paypal](#) (for receiving individual donations)
  - [Stripe](#) (for receiving payments for Harmony Teacher’s Guide)
  - [Quickbooks](#) (where all our financial activity and processing takes place)

- They are only permitted to use your personal data to the extent necessary to enable them to provide their services to us and are required to follow our express instructions and to comply with appropriate security measures to protect your personal data;
- When we are required to share your data with third parties on the basis that we are jointly undertaking the provision of a service to you;
- If and when we sell or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding;
- We may share personal data as we believe necessary or appropriate to comply with applicable laws; to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; to enforce our Policy; and to protect our rights, privacy, safety or property, and/or that of you or others.

### **Anonymous data**

When we use the term “anonymous data,” we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party.

We may create anonymous data from the personal data we receive about you and other individuals whose personal data we collect. Anonymous data might include analytics information and information collected by us using cookies. We make personal data into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you.

### **Third-party sites**

Our Site and services may contain links to third-party websites and features. This Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. We recommend you read their privacy policies before submitting any data to them.

### **User-generated content**

You may share personal data with us when you submit user generated content to our Site, such as comment on a news article or post a message on our noticeboard. Please note that

any information you post or disclose on our Site in this way will become public information, and will be available to other users of our Site and to the general public. We urge you to be very careful when deciding to disclose your personal data, or any other information, on our Site in this way. Such personal data and other information will not be private or confidential once it is published on our Site.

## **Feedback**

If you provide feedback to us, about our Site or services, we may use and disclose such feedback, without your personal data attached, on our Site.

## **Location and accessibility of data**

Information is stored on our secure servers in the UK and we have implemented the appropriate measures to protect it from improper access, destruction, tampering and loss. Data held by the SFT is accessible to all our staff members and contractors so that we can provide thorough and personalised support. The SFT has an internal data protection policy which requires staff and contractors to not share information (other than on the third-party sites listed above) unless required to do so by law.

## **Security**

We seek to use reasonable organisational, technical and administrative measures to protect personal data within our organisation. If you have reason to believe that your interaction with us is no longer secure please immediately notify us of the problem using our contact details found at the bottom of this page.

## **Data retention**

We will only retain your 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.



## **Your rights regarding personal data**

<b>Access</b>	You may access the information we hold about you by contacting us directly using the contact details at the bottom of this page. You can contact us to update or correct any inaccuracies in your personal data using the contact details below.
<b>Amend</b>	You have the right to object to any processing of your data at any time.
<b>Object</b>	You may contact us at any time to opt-out of communications or updates you are receiving from the SFT.
<b>Opt-out</b>	Your personal data is portable, and you have the right to move it to a third party if you wish. Upon receiving such a request, the SFT will provide you with the requested information direct, which you are then free to pass on to a third party.
<b>Move</b>	You have the right to request we erase any information you no longer want us to hold. This erasure will mean you will no longer receive information direct from us.
<b>Erase and forget</b>	

If you wish to exercise any of the rights detailed above, please contact us using the details in the “contact us” section below. In your request, please make clear the following:

- What personal data is concerned;
- Which of the above rights you would like to enforce.

We will need to verify your identity before implementing your request and will try to comply with your request within 30 days. If you wish to enforce any of your rights listed above, please contact us at [info@sustainablefoodtrust.org](mailto:info@sustainablefoodtrust.org). Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any

transactions that you began prior to requesting such change or deletion. We reserve the right to withhold releasing information if in doing so it makes detecting crime more difficult or relates to national security.

### **Complaints**

We are committed to resolving any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us using the details below. We hope to resolve any complaint brought to our attention, however, if you feel that your complaint (about our use of your data) has not been adequately resolved, you have the right to contact the Information Commissioner's Office.

### **Contact Us**

If you wish to contact us regarding your personal data or any information in this policy there are a number of ways to get in touch

Email: [info@sustainablefoodtrust.org](mailto:info@sustainablefoodtrust.org)

Postal address:

Sustainable Food Trust  
38 Richmond Street  
Totterdown  
Bristol  
BS3 4TQ

Telephone: +44 (0) 117 987 1467