

## GRIMME UK

### Privacy Notice

GRIMME UK Limited ("**we, us, our**") is committed to protecting and respecting your privacy and the security of your personal information.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be used by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.grimme.com](http://www.grimme.com) and/or entering into the contractual arrangement for the supply of our products and/or services you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulation, the data controller is GRIMME UK Limited of Station Road, Swineshead, Boston PE20 3PS.

#### **INFORMATION WE COLLECT FROM YOU**

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site [www.grimme.com](http://www.grimme.com) (**our site**) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, make an online enquiry, search for a product, place an order, participate in discussion boards or other social media functions, and if you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, gender, financial and credit card information.
- **Information we collect about you from our site.** With regard to each of your visits to our site we will automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- **Information we receive from other sources.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, service agencies, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

### **OUR USE OF COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

#### **HOW WE MAKE USE OF THE INFORMATION**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- 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.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your

interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from the contract entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;
  - If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.
  - If you are a prospective customer, or where we permit selected third parties to use your data for marketing purposes, we (or they) will contact you by electronic means only if you have explicitly consented to this. If you are happy for us to use your data in this way or to pass your details on to third parties for marketing purposes, please tick the relevant two boxes situated on the form on which we collect your data);
  - If you would like to register to receive our UK magazine (GRIMME Inform) then please complete the contact form found on our site or email sales@grimme.co.uk.
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

- **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

- **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **SHARING YOUR INFORMATION WITH THIRD PARTIES**

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

You acknowledge and agree that we have the right to share your personal information with:

- Any member of the GRIMME group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. In particular, we may share your personal information with GRIMME Landmaschinenfabrik located in Germany, the North American Potato Machinery manufacturer SPUDNIK located in Idaho, USA, the Danish vegetable machinery manufacturer ASA-LIFT located in Denmark and GRIMME Ireland Equipment located in Ireland. Also belonging to the GRIMME group is the company INTERNORM (plastics engineering) and RICON (factory for web and conveying equipment) both located in Germany. Your personal data may be shared with any of the aforementioned entities.
- Selected third parties including:
  - business partners, suppliers and sub-contractors, but only for the performance of any contract we enter into with you. The GRIMME group has its own service agencies in customer markets, including UK, Germany, Belgium, China, Denmark, France, India, Ireland, the Netherlands, Poland, Russia, Turkey and USA;
  - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. *Note: We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;*
  - analytics and search engine providers that assist us in the improvement and optimisation of our site;
  - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

The following third-party service providers process personal information about you for the following purposes:

Croner Simplify – For any Human Resource related activities including recruitment purposes.

Global Payments – Card Processing Transactions

Google Analytics

Facebook Advertising

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if GRIMME UK or any member of its group or substantially all of its or their assets are acquired by a third party, in which case personal data held about its or their customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of sale and other agreements; or to protect the rights, property, or safety of members of the GRIMME group, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 transmitted to our site; 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.

### **TRANSFERRING INFORMATION OUTSIDE THE EEA**

We may transfer the personal information we collect about you to the following countries outside the EEA:

- China, India, Russia, Turkey and USA

Transfer may be necessary in order to perform our services. This includes transfer to organisations engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. If there is no adequacy decision by the European Commission in respect of those countries or the USA Privacy Shield does not apply (meaning such countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information), to ensure that your personal information does receive an adequate level of protection we have put in place the statutory required contractual EU Model Clauses to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

If you require further information about these protective measures, you can request it from our data privacy manager.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.



We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **HOW LONG WE RETAIN YOUR PERSONAL DATA**

We will only retain your personal information 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. In order to comply with law and to ensure we have the necessary information required in order to resolve future issues that might arise, we retain all personal data for a period of [10 years] from collection. 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

- **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes at any point in the future.

- **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "*data subject access request*"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to

process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Donna Hall in writing.

- **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

- **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right

to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Donna Hall. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **AUTOMATED DECISION-MAKING**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- where we have notified you of the decision and given you 21 days to request a reconsideration;
- where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights;
- in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **DATA PRIVACY MANAGER**

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our data privacy manager at [accounts@grimme.co.uk](mailto:accounts@grimme.co.uk)