



RS Agri Ltd

Data Protection Policy

Last Updated On : 08/03/2024



1. INTRODUCTION

RS Agri Ltd (referred in this notice as “our”, “we” or “us”) understand that your privacy is important to you and that you care about how your personal data is used, shared and stored. It is important to note that as Data Controllers, RS Agri Ltd are directly responsible for any personal data we process and must therefore ensure that we are aware of our responsibilities under the law.

2. WHAT IS THIS DATA PROTECTION POLICY?

This policy sets out our approach to protecting personal data and explains your rights in relation to how we may process personal data. We provide more detail in respect of how we process and protect your data below.

3. WHO WE ARE?

RS Agri Ltd is a private company limited by shares (Ltd) registered under Company Number 06905177 with Companies House. We are registered with the Information Commissioners Office (the ICO), with the reference number C1079111.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through our company and our website. Although, internet-based data transmissions can in principle exhibit security vulnerabilities, so absolute protection cannot be guaranteed. For this reason, every person affected is free to transmit personal data to us by alternative means, such as by telephone.

If you have any queries or requests relating to data protection, please email data.protection@rsagri.com. Our Data Protection Officer is Sam Lloyd, a Director of RS Agri Ltd.

4. DEFINITIONS

4.1 Personal Data

Personal data is any information that relates to an identified or identifiable individual. An identifiable individual is someone who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, address, contact information or an online identifier such as an IP address.

4.2 Data Subject

A data subject is an individual who can be identified from personal data.

4.3 Processing

Processing means taking any action with an individual's personal data.

4.4 Data Controller

A data controller has the responsibility of deciding how personal data is processed and protecting it from harm. Data controllers aren't usually individual people, they can be a limited company, an organisation, charity, association, club, volunteer group, or business.

4.5 Data Processor

A data processor is an individual, public authority, agency or other body which processes personal data on behalf of the data controller.

4.6 Third-Party

A third-party is an individual, public authority, agency or other body which processes data under direct responsibility from the data controller or data processor.

4.7 Lawful Basis

Lawful basis is a valid reason for you to collect or use personal data. There are six lawful basis:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

4.7.1 Consent

Consent is appropriate when you can offer people real choice and control over how you use their information.

4.7.2 Contract

Contract is appropriate when you need to collect or use a person's information to deliver a contractual service to them, or because they've asked you to do something before entering into a contract

4.7.3 Legal Obligation

Legal obligation is the most appropriate lawful basis if you're required to collect or use personal information in order to comply with the law.

4.7.4 Vital interests

Vital interests is appropriate if you need to use or share personal information to protect someone's life.

4.7.5 Public Task

Public task is used by public authorities or organisations carrying out specific tasks in the public interest. This lawful basis may be appropriate if you work on behalf of a public authority.

4.7.6 Legitimate interests

Legitimate interests is where using personal information is in the legitimate interests of yourself, an individual or a third party, and can include commercial interests or wider benefits for society. You must be able to justify this.

5. YOUR RIGHTS

As a data subject, you have the right to object to how we process your personal data. You also have the right to access, correct, sometimes delete and restrict the personal data we use. In addition, you have a right to complain to us and to the Information Commissioner's Office (the ICO).

Unless subject to an exemption under the GDPR and DPA 2018, you have the following rights with respect to your personal data.

5.1 The Right to be Informed

Any individual affected by the processing of personal data has the right to be informed in a clear and concise manner on how we process your personal data.

5.2 The Right to Access Your Personal Data

Any individual affected by the processing of personal data has the right to access their personal data that we are processing. You also have the right to request a copy of your personal data that we hold about you. This will you understand how and why we are using your personal data and check if we are doing it lawfully.

5.3 The Right to Rectification

Any individual affected by the processing of personal data has the right to request that inaccurate personal data concerning them be corrected without undue delay. Additionally, the data subject has the right to request the completion of incomplete personal data, although this will depend on the purposes for the processing.

If a data subject wishes to exercise this right to rectification, they at any time, please contact us by email at data.protection@rsagri.com or by telephone on +44 (0) 1256 85077.

5.4 The Right to Erasure

Any individual affected by the processing of personal data has the right to request the controller to erase without delay the personal data concerning them. The right only applies to data held at the time the request is received. It does not apply to data that may be created in the future.

The right is not absolute and only applies in certain circumstances, these are listed below:

- The personal data is no longer necessary for the purpose which we originally collected or processed it for
- We are relying on consent as the lawful basis for holding the data, and the individual withdraws their consent
- We are relying on legitimate interests as the basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing
- We are processing the personal data for direct marketing purposes and the individual objects to that processing
- We have processed the personal data unlawfully
- We have to do it to comply with a legal obligation
- We have processed the personal data to offer information society services to a child

If one of the circumstances above is met, and a data subject wishes to request to erase personal data stored by us, at any time, please contact us by email at data.protection@rsagri.com or by telephone on +44 (0) 1256 85077.

5.5 The Right to Restrict Processing

Any individual affected by the processing of personal data has the right to request the controller to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way that an organisation uses their data. This is an alternative to requesting the erasure of their data.

Individuals have the right to request you restrict the processing of their personal data in the following circumstances:

- The individual contests the accuracy of their personal data and we are verifying the accuracy of the data
- The data has been unlawfully processed and the individual opposes erasure and requests restriction instead
- We no longer need the personal data but the individual needs us to keep it in order to establish, exercise or defend a legal claim
- The individual has objected to us processing their data under the right to object, and we are considering whether our legitimate grounds override those of the individual.

Although this is distinct from the right to rectification and the right to object, there are close links between those rights and the right to restrict processing:

- If an individual has challenged the accuracy of their data and asked for we to rectify it, they also have a right to request we restrict processing while we consider their rectification request
- If an individual exercises their right to object, they also have a right to request we restrict processing while we consider their objection request

If one of the circumstances above is met, and a data subject wishes to request the restriction of personal data stored by us, at any time, please contact us by email at data.protection@rsagri.com or by telephone on +44 (0) 1256 85077.

5.6 The Right to Data Portability

Any individual affected by the processing of personal data has the right to receive personal data they have provided to a controller in a structured, commonly used and machine readable format. It also gives them the right to request that a controller transmits this data directly to another controller.

The right to data portability only applies when:

- Our lawful basis for processing this information is consent or for the performance of a contract
- We are carrying out the processing by automated means (ie excluding paper files).

Information is only within the scope of the right to data portability if it is personal data of the individual that they have provided to us.

5.7 The Right to Object

Any individual affected by the processing of personal data has the right to object to the processing of their personal data at any time. This effectively allows individuals to stop or prevent us from processing their personal data. An objection may be in relation to all of the personal data you hold about an individual or only to certain information. It may also only relate to a particular purpose you are processing the data for

We shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the person concerned, or for the assertion, exercise or defence of legal claims.

As we process personal data for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing purposes. If the data subject objects to us processing personal data for direct marketing purposes, we will no longer process the personal data for these purposes.

5.8 The Right to Withdraw Consent Under Data Protection Law

Any individual affected by the processing of personal data has the right to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.”

5.9 Rights in Relation to Automated Decision Making & Profiling

Any individual affected by the processing of personal data has the right not to be subject to a decision based solely on automated processing including profiling.

6. TYPES OF PERSONAL DATA WE COLLECT

6.1 Personal Details & Contact Information

- Name
- Address
- Contact phone and mobile numbers
- Email address

6.2 Transaction & Financial Account Information

- Financial information
 - Account holder name
 - Account number
 - Credit/debit card information
 - Contact hire information
- Transaction information
 - Purchases
 - Purchase history
 - Sales enquiries, quotations, orders & invoices
 - Service history
 - Payments
 - Complaints
 - Claims

6.3 Preference & Relationship Information

- Property, farm or business information
- Details of accounts with us
 - Purchases
 - Purchase history
 - Sales enquiries, quotations, orders & invoices
 - Customer accounts
 - Warranty claim history
 - Payment history

6.4 Computer, Device, Online Services, Social Media & Internet Information

- Information about pages or content visited on our website and social media
- Social media profile and comments
- Sent, opened and read notifications from our accountancy software
- Time & duration of use of our website

7. HOW WE PROCESS PERSONAL DATA

7.1 How We Collect Personal Data?

7.1.1 Directly From You

We collect personal data when you interact with us. You may provide personal data to us electronically, in writing or verbally.

Common interactions where you provide personal data to us include when you:

- Purchase services, parts or machinery from us
- Setting up an account
- Sign up to RS Update, our email newsletter
- Use our online live chat system
- Use our online contact form

7.1.2 Show Enquiry Form

For our show enquiry forms, we either collect personal data on paper or by online form, depending on if internet or digital access is possible. With our online form we use an automated decision making process, to email all enquiry into a secure mailbox. Apart from this we do not use any automated decision making.

With our show enquiry form, we collect the following personal data:

- Show (required form field)
- Name (required form field)
- Trading name
- Address
- Contact number
- Mobile number (required form field)
- Email address (required form field)
- Enquiry area (required form field)
- How did you hear about us? (required form field)
- Notes
- Permission (required form field)

7.1.3 Website Contact Form

We collect personal data using our website contact form, the data collected from this form is emailed to a secure mailbox.

With our website contact form, we collect the following personal data:

- Name
- Email address
- Contact number
- Enquiry area
- Enquiry message
- Where did you hear from us?

7.1.4 Third Parties

We use different third-party systems to collect personal data for ease of our use. We do not share any personal data with the following third parties, we only use them to collect personal data.

7.1.4.1 Tidio

We use Tidio as our website live chat system to collect personal data from the data subject when they interact with our website live chat system.

With Tidio we collect the following personal data:

- Name
- Email address
- Contact number
- IP address
- Used internet browser
- Viewed website pages

7.1.4.2 Dext

We use Dext to easily process purchase invoices and expenses. To see what data we collect using Dext, please contact us by email at data.protection@rsagri.com, by telephone on +44 (0) 1256 850777.

7.1.4.3 Microsoft Forms

We use Microsoft Forms for our show enquiry form, To see what data we collect using Microsoft Forms, please see the '7.1.2 Show Enquiry Form' section above.

7.2 How We Store Personal Data?

All online personal data is kept in a secure cloud server and all hard copies of personal data is kept in a secure location. All computers are password protected and only the computer operator knows the password.

We generally store personal data in the following ways:

- Microsoft 365
 - We use this for our emails and document creation.
- Flowlens
 - We store addresses and sales and purchases history for the purpose of our company accounts. Using secure passwords known by the operator, all personal data is kept extra secure.
- Xero
 - We store addresses and sales and purchases history for the purpose of our company accounts. Using multi-factor authentication to login into the system, with this and only having secure passwords known by the operator, all personal data is kept extra secure.
- Dropbox
 - We use this to store all our internal and external files.
- Tidio
 - We store our open live chats on here. Once the live chat has been closed, the conversation is solved and then deleted.
- Hard Copies
 - We store hard copies of parts picking lists in a secure location for the purpose of seeing a customer's purchase history and for our company accounts. We keep all hard copies of personal data to a minimum.

7.3 How We Use Personal Data?

All personal data is processed and stored securely. Our use of personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. subscribing to RS Update), or because it is in our legitimate interest.

Specifically, we may use your personal data for the following purposes:

- Setting up or managing your account
- Supplying our services, parts or machinery to you (please note that we require your personal data in order to enter into a contract with you)
- Replying to emails from you
- Our email newsletter that have opted into (you can unsubscribe at any time)

We use your personal data for our email newsletter, RS Update. We use RS Update to supply you with the following information:

- New & current products we offer
- Sneak peaks into new machine developments
- Latest offers & deals on spare parts
- Company news
- Machine features
- Benefits of using RS Agri and our machines
- Machine stock list
- How to Guides – for repairing, maintaining, and getting the most from you machine

RS Update is a bi-monthly email newsletter, we will not use it to send you unsolicited marketing or spam emails and we will take all reasonable steps to ensure that we fully protect your rights and comply with all regulatory requirements.

7.4 Do We Share Personal Data?

We do have to share certain personal data with selected third parties for specified purposes, see the '7.4.1 Third Parties' section below for more information. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

You agree that we have the right to share your personal data with selected third parties including:

- RS Agri appointed dealers
- Couriers & haulers
- Our software providers
- Debt recovery agencies

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

In certain circumstances, we may also share your personal data with third parties:

- If we are legally required to share certain personal data held by us, such as where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction.
- If we bring in a debt recovery agency to recover outstanding debt.

7.4.1 Third Parties

Below is a list of the personal data we have to share with selected third parties, not all third parties listed in the table below have access to all of the information below. For more information on what personal data is shared with what third party, please contact us by email at data.protection@rsagri.com, by telephone on +44 (0) 1256 850777.

- Trading name
- Contact details
- Billing & delivery address
- Email address
- Bank details

Third party	Data category	Purpose
RS Agri Appointed Dealers	Personal	To repair, service or sell machinery or goods
APC Overnight – Swift Logistics Group	Personal	Delivering parcels of goods
APC Overnight – P J Couriers	Personal	Delivering parcels of goods
Interparcel	Personal	Delivery parcels of goods
EV Cargo (Palletforce)	Personal	Delivering pallets of goods
Martin Pugh	Personal	Delivering machinery or goods
MailChimp	Personal	Email marketing
Microsoft 365	Personal	Data storing with Outlook
Dropbox	Personal	Data storing for internal & external files
Flowlens	Personal	Parts & machinery sales & purchasing
Xero	Personal	Financial invoicing & accountancy
Telleroo	Personal	Making payroll payments
TakePayments	Personal	Credit/Debit card payments
Empowered by Cloud	Personal	Making payments from our bank account

8. LAWFUL BASIS OF PROCESSING PERSONAL DATA

We comply with our obligations under the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

We do this by:

- Keeping personal data up to date
- By storing and destroying personal data securely
- By not collecting or retaining excessive amounts of personal data
- By protecting personal data from loss, misuse, unauthorised access and disclosure
- By ensuring that appropriate technical measures are in place to protect personal data

In most cases, the lawful basis for processing personal data will be either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. subscribing to RS Update), or because it is in our legitimate interest.

We use personal data for the following purposes:

- To set up customer & supplier accounts
- To ship parts or machinery by courier or hauler
- Sell services, parts or machinery
- Provide an email newsletter

9. DATA MANAGEMENT

9.1 Data Retention

We keep different types of personal data for different periods of time as required by law or best practice. We ensure that we store this in line with our Data Retention Policy. To see this policy, please visit our website, contact us by email at data.protection@rsagri.com or by telephone on +44 (0) 1256 850777.

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

9.2 Data Breaches

Any loss of personal data, as described in the legislation, must be reported to the Data Protection Officer (DPO) including:

- Data being accessed by an unauthorised person(s) either internally or externally
- Data or records being lost or found
- Systems failing their security including IT and hard copy files

The DPO will consider the seriousness of the data breach and if necessary, report the matter to the Information Commissioner's Office (ICO). The record of every Data Breach and the actions taken will be recorded in the Data Privacy Breach log. We will cooperate with the ICO fully to respond to any matters.

The matter will be investigated and if possible, the root cause of the breach will be determined. Corrective action will be taken in accordance with the regulations.

If a breach is likely to result in a high risk to the rights and freedoms of individuals, those affected by the data breach will be informed as soon as is practicable so that they may take appropriate action. All breaches will be reported as a matter of routine to the Directors.

9.3 Data Security

We only keep personal data for as long as we need to, in order to use it as described above and/or for as long as we have your permission to keep it.

Data security is very important to us and to protect your data we have taken all the necessary steps to secure and safeguard all data we collect.

9.4 Dealing With Data Requests

9.4.1 Data Requests Fee

You will not have to pay a fee to access your personal data (or to exercise any of your other rights, mentioned in the '5 YOUR RIGHTS' section above). 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.

9.4.2 Confirmation

We may need to request specific data from you to help us confirm your identity and ensure you have the right to access the data (or to exercise any of your other rights, mentioned in the "Your Rights" section above). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further data in relation to your request to speed up our response.

9.4.3 Time Limit to Respond

We try to respond to all legitimate requests within one month. Rarely it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. AMENDMENTS TO THIS DATA PROTECTION POLICY

From time to time, we may update this policy. If we make amendments, we will revise the "Last Updated On" date on the front page of this notice and update the privacy policy link on our website.

11. HOW TO CONTACT US

If you have any queries, questions, concerns or requests relating to data protection, this privacy notice or our use of your personal data, please contact us by email at data.protection@rsagri.com or by telephone on +44 (0) 1256 850777, or by post to the address below.

11.1 Our Contact Details

RS Agri Ltd
Balstone Farm
Ibworth
Basingstoke
Hampshire
RG26 5TJ
United Kingdom

Email: info@rsagri.com

Telephone: +44 (0) 1256 850777

11.2 Information Commissioner's Office (ICO) Contact Details

In situations where you feel we have not handled your personal data query/complaint appropriately you have the right to inform the Information Commissioner's Office (ICO), to do this please visit - <https://ico.org.uk/>.

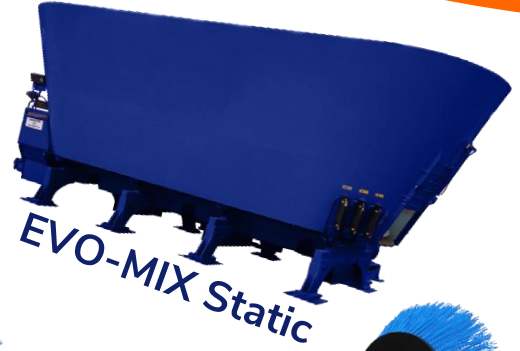
12.NOTES



EVO-BED PEGASUS



SABRE 600+



EVO-MIX Static



EVO-BED NOVA



EVO-MIX S



EVO-BED PHOENIX



EVO-MIX PRO



EVO-BED VELA



EVO-BED ORION



SABRE 900+



EVO-MIX ONE



EVO-MIX



EVO-BED eNOVA

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