

# NATIONAL FARMERS UNION

## PRIVACY POLICY

This Privacy Policy sets out the basis on which we collect and use personal information about you as part of our activities.

This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.

In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you. Section 2 below sets out the personal information we collect in more detail.

References to:

- **we, us or our** in this Privacy Policy means the NFU entity which controls your personal information which may be:
  - National Farmers Union of England and Wales (NFU) with its office at Agriculture House, Stoneleigh Park, Kenilworth, Warwickshire, CV8 2TZ and is registered as an Employers Association under the Trade Union and Labour Relations (Consolidation) Act 1992 with the Certification Office number 245E;
  - NFU Services Limited, a company incorporated in England and Wales (CN 03687910) having its registered office at Agriculture House, Stoneleigh Park, Kenilworth, Warwickshire, CV8 2TZ; or
  - NFU Energy Limited, a company incorporated in England and Wales (CN 04056474) having its registered office at Agriculture House, Stoneleigh Park, Kenilworth, Warwickshire, CV8 2TZ,

and includes a number of brand names under which they operate, for example, NFU Cymru, NFU Countryside, NFUPro, NFU Employment Service, NFU Energy (NFU Energy Service), Great British Chicken, Campaign for the Farmed Environment, Tried and Tested and TB Free England;

- **commercial partners** means the third parties who offer discounted products and services to you because of your NFU membership. Details of these third parties can be found at <https://www.nfuonline.com/membership/your-nfu-discounts/>, <https://www.countrysideonline.co.uk/home/our-community/member-benefits/> and <https://www.nfuonline.com/membership/your-nfu-services/>; and
- **websites** means [www.nfuonline.com](http://www.nfuonline.com), [jobs.nfuonline.com](http://jobs.nfuonline.com), [web.nfuonline.com](http://web.nfuonline.com), [ecommerce.nfuonline.com](http://ecommerce.nfuonline.com), [www.countrysideonline.co.uk](http://www.countrysideonline.co.uk), [join.countrysideonline.co.uk](http://join.countrysideonline.co.uk), [www.nfuemploymentservice.com](http://www.nfuemploymentservice.com), [www.greatbritishchicken.co.uk](http://www.greatbritishchicken.co.uk), [www.cfeonline.org.uk](http://www.cfeonline.org.uk), [www.nutrientmanagement.org](http://www.nutrientmanagement.org), [www.nfu-cymru.org.uk](http://www.nfu-cymru.org.uk) and <http://www.tbfreeengland.co.uk/home/>.

### 1. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 1.1 For the purpose of data protection law, the National Farmers Union is the data controller in respect of the personal information that is collected and used as part of our activities. The National Farmers Union also has two trading entities, NFU Services Limited and NFU Energy Limited, and where those entities provide services to you, they will be a data controller. A data controller is the entity that determines the purpose for which your personal information is used and how it is used.

- 1.2 If you are providing personal information to us relating to a third party (for example relatives or dependents), you automatically confirm that you have the consent of the third party or are otherwise permitted to share such personal information with us and that you have made the information in this Privacy Policy available to the third party before providing his/her personal information to us.

## **2. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?**

- 2.1 We collect personal information about a range of individuals, including our members, prospective members, former members, subscribers to any of our publications, individuals who are interested in our messages and want to support us and other individuals who work in the same industry as us and who attend our events and/or we have contact with in the course of promoting and furthering our aims. The personal information we hold about you and the way in which we use it will differ depending on our relationship with you. We have provided further details below.

### **Members, Former Members and Prospective Members and other Supporters**

- 2.2 This section of the Privacy Policy applies if you are a member, former member, subscriber to any of our publications, someone who may be interested in membership of NFU or otherwise supports our aims and objectives.
- 2.3 We collect and use personal information about you as part of our activities. The personal information we collect includes:

#### **2.3.1 Information that you provide to us**

The information that you provide to us may include your full name, postal address, email address, telephone number, mobile number, financial information, payment information, photograph, registration numbers, insurance information and your password to access your NFU account or mobile application. You may also provide information to us in respect of your farming business. This information may be provided:

- (a) in the course of communications between you and us (including face to face, by phone, email or otherwise);
- (b) when you fill in forms on our websites;
- (c) when you register to attend our events;
- (d) when you submit a membership joining or renewal form to us;
- (e) via our social media pages, other social media content, tools and applications;
- (f) when you visit our events or shows or other venues or places where we are present or actively working;
- (g) when you call our helplines (e.g. CallFirst);
- (h) when you enter competitions that we run from time to time; and
- (i) when you speak to our researchers, colleagues or people authorised on behalf of us to carry out research.

#### **2.3.2 Information we collect from you**

- (a) technical information (to the extent that it constitutes personal information) including the IP address you use to connect your device to the Internet and the browser type, version you use on your device and duration of your visit to the websites);

- (b) information about your use of the websites or our mobile application (to the extent that it constitutes personal information) including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products and/or services 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), login details, and methods used to browse away from the page and any phone number used to call our customer service number;
- (c) information contained in and records of communications between you and us, including emails, calls, SMS messages and letters;
- (d) information regarding your marketing preferences;
- (e) records of meetings and events you attend; and
- (f) recordings of telephone conversations when you call our helplines (e.g. Call First).

### 2.3.3 Information we receive from other sources

- (a) details from one of our commercial partners (see above for the links to find out who our commercial partners are) about any products or services you receive from them;
- (b) information that we receive from governmental departments (e.g. DEFRA) or other industry bodies in respect of research or work that we are commissioned by them to carry out from time to time; and
- (c) contact details or other relevant information we receive from the National Farmers Union Mutual Insurance Society Limited (**NFU Mutual**) to enable us to send you direct marketing.

## **Business Contacts**

2.4 In the course of running our organisation we gather personal information about a number of individuals who are not members or former members, for example, stakeholders, local authority contacts and journalists. This section applies to those business contacts.

2.5 We collect and use personal information about you as part of our business activities.

### 2.5.1 Information that you provide to us

The information that you provide to us may include your name, postal address, email address, telephone number, mobile number, payment information, and registration numbers. This information may be provided:

- (a) in the course of communications between you and us (including by phone, post, email or otherwise);
- (b) when you register to attend our events; and
- (c) via our social media pages, other social media content, tools and applications.

### 2.5.2 Information we collect from you

- (a) information contained in and records of communications between you and us, including emails, calls, SMS messages and letters;

- (b) information regarding your marketing preferences;
- (c) records of meetings and events you attend; and
- (d) information regarding your expertise in an area of the industry in which we operate.

**2.5.3 Information we receive from other sources**

- (a) information that we receive from governmental departments (e.g. DEFRA) or similar industry bodies in respect of research or work that we may be commissioned by them to carry out;
- (b) information from publicly available sources; and
- (c) details from companies we instruct to carry out credit checks on you or the organisation you work for in connection with the sale by us of advertising opportunities.

**3. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?**

3.1 We use your personal information to carry out our activities. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the purposes set out below. For each of these purposes, we have set out the legal basis on which we use your personal information and detailed which category of personal information we use for that purpose (by reference to the paragraph numbering from earlier in this Privacy Policy).

**Members, Former Members and Prospective Members and other Supporters**

3.2 This section of the Privacy Policy applies if you are a member, former member, subscriber to any of our publications someone who may be interested in membership of NFU or otherwise supports our aims and objectives.

Purpose	Legal Basis	Category of personal information used for this purpose
To provide you with our membership services.	This is necessary for the performance of our contractual obligations with you to provide membership services.	2.3.1 2.3.3
To provide you with details of the benefits and schemes that we offer to our members.	This is in our legitimate interests because it furthers our aims and objectives.  In certain circumstances we may rely on consent to send certain communications to you.  This may also be necessary for the performance of our contractual obligations with you to provide membership services.	2.3.1
To communicate with you and other individuals.	This is in our legitimate interests because it furthers our aims and objectives and enables us to	2.3.1 2.3.2

Purpose	Legal Basis	Category of personal information used for this purpose
	<p>provide our membership services to you.</p> <p>We may also communicate with you to perform any contractual obligations with you.</p>	
To manage our business.	This is in our legitimate interests because this furthers our aims and objectives.	2.3.1 2.3.2 2.3.3
To carry out our obligations arising from any contracts entered into between you and us.	This is to perform our contractual obligations with you.	2.3.1 2.3.3
To carry out research either for our own purposes or on behalf of a third party, such as Defra, undertake work for the farming community and analyse the member services received by you (including to carry out a member survey).	This is in our legitimate interests or the legitimate interests of the applicable third party as it enables us or them to assess the effectiveness and relevance of the services and benefits we offer.	2.3.1 2.3.2
To manage complaints, feedback and queries from our members and people who use our services.	This is in our legitimate interests because it furthers our aims and objectives.	2.3.1
To improve the quality of our Site and membership services.	This is in our legitimate interests to improve and develop our operations and service offering.	2.3.2 2.3.1
To send you marketing materials about offers or services of NFU and other third parties. Please see section 4 below for further information.	We may send you these details in accordance with any consent you have given us.	2.3.1
To send you communications as part of your membership for example relating to industry news or other information that might be helpful to your business (such as information about prevention of rural crime or crop protection). You can also subscribe to receive additional communications such as Countryside and Back British Farming.	<p>This is in our legitimate interests to provide you with routine communications to further our aims and objectives.</p> <p>This may also be necessary for the performance of our contractual obligations with you to provide membership services.</p> <p>In certain circumstances we may rely on consent to send certain communications to you.</p>	2.3.1

Purpose	Legal Basis	Category of personal information used for this purpose
To notify you about changes to our membership services.	This is in our legitimate interests to further our aims and objectives.	2.3.1
To comply with any legal or regulatory obligations (including in connection with a court order).	This is necessary for us to comply with our legal obligations.	2.3.1 2.3.2 2.3.3
To promote the industry and the work that we undertake.	This is in our legitimate interests to further our aims and objectives.	2.3.1
To contact you once you cease to be a member either by post or e-mail about renewing your membership or subscribing to the Countryside magazine or one of our other publications.	This is in our legitimate interests to further our aims and objectives.  In certain circumstances we may rely on consent to send certain communications to you.	2.3.1
To share your personal information with NFU Mutual so that it can send you marketing communications about insurance and other financial services and products which may be relevant to you.	We will rely on your consent to share your personal information with NFU Mutual so that it can send direct marketing.	2.3.1
To administer any competitions and prize draws	This may be necessary for the performance of our contractual obligations under the competition/prize draw terms.	2.3.1
To publicise the winners of any competitions and prize draws.	We may publicise details of the winners to: (i) comply with our legal obligations; or (ii) with your consent.	2.3.1

### **Business Contacts**

3.3 In the course of running our organisation we gather personal information about a number of individuals who are not members or former members, for example, stakeholders, suppliers, advertisers, local authority contacts and journalists. This section applies to those business contacts and details which category of personal information we use for that purpose (by reference to the paragraph numbering from earlier in this Privacy Policy).

Purpose	Legal Basis	Category of personal information used for this purpose
To communicate with you and other individuals.	This is in our legitimate interests because it furthers our aims and objectives and enables us to provide our resources and services to you.  We may also communicate with you to perform any contractual obligations with you.	2.5.1 2.5.2
To manage our business.	This is in our legitimate interests because this furthers our aims and objectives.	2.5.1 2.5.2 2.5.3
To carry out research, undertake work for the farming community and analyse the member services that we provide.	This is in our legitimate interests as it enables us to assess the effectiveness and relevance of the services and benefits we offer.	2.5.1 2.5.2
To send you service communications such as our newsletter.	This is in our legitimate interests as it furthers our aims and objectives.  In certain circumstances we may rely on consent to send certain communications to you.	2.5.1 2.5.2
To send you details of advertising opportunities.	This is in our legitimate interests as it generates revenue to allow us to continue to further our aims and objectives.  In certain circumstances we may rely on consent to send certain communications to you.	2.5.1
To promote the industry and the work that we undertake.	This is in our legitimate interests to further our aims and objectives.	2.5.1
To carry out credit checks against you or the organisation you work for in connection with the sale by us of advertising opportunities.	This is in our legitimate interest to establish if you or the organisation you work for will be able to pay for any advertising opportunity you are interested in. In certain circumstances we may rely on consent to undertake these checks.	2.5.1

3.4 We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. We will inform you of this at the time that we are obtaining your personal information from you.

#### **4. HOW DO WE SHARE PERSONAL INFORMATION WITH, AND MARKET THE PRODUCTS, SERVICES AND EVENTS OF THIRD PARTIES?**

- 4.1 Subject to any marketing preferences you provide, we may contact you from time to time with details of promotions, offers, shows and events that might be of interest to you which are offered by our commercial partners, industry bodies, charities, (both local and national) or NFU Mutual and other organisations (together the **Third Parties**).
- 4.2 Where we share your personal information with one of the Third Parties, we will do so because:
- 4.2.1 you have told us you are interested in the products or services offered by the relevant commercial partner or industry body and we need to share your details with them so that the commercial partner or industry bodies can contact you about those products or services, or grant you access to those products or services; or
  - 4.2.2 the commercial partner/industry body needs us to verify that you are a current member of the National Farmers Union or a subscriber to one of its services/publications (where relevant) for the purposes of applying any discounts or promotional offers which are linked to your membership; or
  - 4.2.3 you have told us that you have an issue or query with the relevant commercial partner or industry bodies and we need to share your details with them to escalate the matter.
- 4.3 We work closely with NFU Mutual to support businesses in the farming industry so we may from time to time send you details of their products or services which we think will be of interest.
- 4.4 The commercial partner or industry body may use your personal information for their own purposes. For information about how the commercial partners use your personal information, please see the website of the relevant commercial partner or industry body.

#### **5. WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?**

- 5.1 We share your personal information with:
- 5.1.1 our services providers and sub-contractors for the performance of our membership services (including marketing services providers, IT services providers and consultants, social media providers, third party training providers and third party storage providers);
  - 5.1.2 Warners Group Publications Plc;
  - 5.1.3 certain commercial partners, industry bodies, charities (both local and national) and other organisations as described above;
  - 5.1.4 our professional advisors (including accountants and lawyers) that assist us in carrying out our activities;
  - 5.1.5 professional advisors (including lawyers, rural surveyors, land managers, debt advisers, tenants service advisers, energy advisers) who provide assistance to our members through our helpline (e.g. CallFirst) and we will inform you if your personal information is being shared with a third party in order to assist with your query;
  - 5.1.6 other organisations that are part of our group;
  - 5.1.7 analytics and search engine providers that assist us in the improvement and optimisation of our websites (including Google Analytics); and



- 5.1.8 external agencies and organisations for the purpose of complying with applicable legal and regulatory obligations (including HMRC, Defra etc.).
- 5.2 We can also disclose your personal information to other third parties, for example:
  - 5.2.1 in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;
  - 5.2.2 if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
  - 5.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.
- 5.3 We will share your personal information with the NFU Mutual which is an entity associated with NFU that provides insurance and other financial services and products to the farming community because we share a number of technical and personnel resources and with your consent allow NFU Mutual to send you direct marketing about insurance and other financial services and products which may be relevant to you. NFU Mutual will use your personal information for its own purposes. For information about how NFU Mutual may use your personal information, please see NFU Mutual's website: [www.nfumutual.co.uk/privacy](http://www.nfumutual.co.uk/privacy).

## **6. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?**

We will process your personal information both within and outside the UK and the European Economic Area (**EEA**). We may transfer your personal information outside the UK and the EEA to Canada. The European Commission has provided that commercial enterprises in Canada afford adequate safeguards to personal information that is transferred to or accessed from Canada.

## **7. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION**

- 7.1 We will keep personal information for as long as is necessary for the purposes for which we collect it. The precise period will depend on the purpose for which we hold your information. For example where we hold personal information:
  - 7.1.1 to comply with a legal or regulatory obligation, we will keep the information for at least as long as is required to comply with that obligation.
  - 7.1.2 in order to provide a product or service, we will keep the information for at least as long as we provide the product or service, and for a number of years after your membership expires.

## **8. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?**

- 8.1 We will use appropriate technical and organisational security measures which comply with the requirements of data protection law in order to keep your personal information secure against unauthorised or unlawful use and accidental loss, destruction or damage.
- 8.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our websites and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

## 9. YOUR RIGHTS

You have certain rights with respect to your personal information. The application of the rights will depend on the certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. To exercise these rights please use the contact details at section 11.

	Summary of your rights
<b>Right of access to your personal information</b>	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
<b>Right to rectify your personal information</b>	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
<b>Right to erasure of your personal information</b>	You have the right to ask that your personal information be deleted in certain circumstances. For example: <ul style="list-style-type: none"> <li>(i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used;</li> <li>(ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information;</li> <li>(iii) if you object to the use of your personal information in accordance with the right to object, as set out below;</li> <li>(iv) if we have used your personal information unlawfully; or</li> <li>(v) if your personal information needs to be erased to comply with a legal obligation.</li> </ul>
<b>Right to restrict the use of your personal information</b>	You have the right to suspend our use of your personal information in certain circumstances. For example: <ul style="list-style-type: none"> <li>(i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information;</li> <li>(ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead;</li> <li>(iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or</li> <li>(iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.</li> </ul>
<b>Right to data portability</b>	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies: <ul style="list-style-type: none"> <li>• to personal information you provide to us;</li> <li>• where the use of your personal information is based on:</li> </ul>

	Summary of your rights
	<ul style="list-style-type: none"> <li>• -your consent; or</li> <li>• for the performance of a contract; and</li> <li>• when the use of your personal information is carried out by automated (i.e. electronic) means.</li> </ul>
<b>Right to object to the use of your personal information and direct marketing</b>	<p>You have the right to object to the use of your personal information in certain circumstances. For example:</p> <p>(i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and</p> <p>(ii) if you object to the use of your personal information for direct marketing purposes.</p>
<b>Right to withdraw consent (including to direct marketing)</b>	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal information.</p>
<b>Right to complain to the relevant data protection authority</b>	<p>You have the right to complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law. In the case of the National Farmers Union, this would be the Information Commissioner's Office</p>

## 10. CHANGING YOUR MARKETING PREFERENCES

You have the right to withdraw marketing consent or change your preferences. To do so please visit us online at <https://www.nfonline.com/myaccount/> or for Countryside members <https://www.countrysideonline.co.uk/Account/Login> (you will need your membership number and password) or call us on 0370 845 8458

## 11. QUERIES

If you have any queries about the way we handle your personal information, please contact The Compliance Department using the details below:

By e-mail: [call.first@nfu.org.uk](mailto:call.first@nfu.org.uk) By post: NFU, Agriculture House, Stoneleigh Park, Stoneleigh, Warwickshire, CV8 2TZ

By phone: 0370 845 8458

## 12. 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. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy [https://www.nfonline.com/cookie\\_nfonline\\_10v/](https://www.nfonline.com/cookie_nfonline_10v/)

## 13. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy will be posted on this page. We will inform you of the updates and where appropriate we will give reasonable notice of any changes.

This Privacy Policy was last updated on 03 June 2019.