

# Organic Trust CLG



## Privacy Policy

### GDPR

Regulation (EU) 679/2016 General Data Protection Regulation (GDPR) of the European Parliament and of the Council is effective from May 25th 2018. GDPR is designed to give individuals better control over their personal data and establish one single set of data protection rules across Europe.

The Data Protection Bill 2018 incorporates Ireland's national implementing measures required under the GDPR and creates a new regulatory framework for the enforcement of data protection laws in Ireland.

The aim of this document is to provide specific information regarding the Data Protection obligations of Organic Trust CLG in order to ensure that the organisation complies with the requirements of the GDPR and the Data Protection Bill 2018.

### Organic Trust Commitment to Protecting & Respecting your Privacy

Organic Trust CLG is committed to protecting and respecting your privacy. This privacy policy explains how and why we process personal information about you, whether you are a client, member or potential member (referred to throughout as "**clients**"), a visitor to our website ( [www.organictrust.ie](http://www.organictrust.ie) ) or where you otherwise communicate with our organisation.

In this Privacy Policy, the **terms "we", "our" and "us"** are used to refer to Organic Trust CLG, Vernon House, 2 Vernon Avenue, Clontarf, Dublin D03P6D0, Ireland. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

We will obtain your personal data for purposes which are specific, lawful and clearly stated. Any use of the data by us will be compatible with the purposes for which the data was acquired.

We employ high standards of security in order to protect the personal data under our care. We will ensure that appropriate security measures are taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by us.

Through our internal audit process, we will conduct regular assessments of data accuracy to establish the data is maintained up to date and accurate.

This privacy policy also includes our policy on the use of cookies on our website.

## Information We May Collect From You

We obtain information about you when you visit our website or otherwise engage with our organisation. For example, when you contact us about our products and services and/or when you join or apply to join as a member or client of the Organic Trust CLG.

- **Information you give us.** This is information about you that you give us by filling in forms on our site / in person or by corresponding with us by telephone (including texting), face-to-face, post, e-mail or otherwise and includes any information you may provide to us when, for example: you use our site; you sign up to use our services or certain third party services; you fill out application forms as part of the inspection/certification process; you apply for a license renewal; we verify your identity; and / or you report a problem with our site or submit a complaint. The information you give us may include your name, address, date of birth, gender, e-mail address, username and password, phone number, details of any comments you provide to us and financial and credit card information. Other information you give us may include feedback regarding our services or our sites and responses to surveys and/or market research (*although you do not have to respond to such surveys or requests*). We may also collect and process records of any correspondence and communications with us and telephone calls may also be recorded.
- **Information we collect about you.** With regard to each of your visits to our site or our organisation, we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, MAC addresses, traffic data, location data, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and cookies, which will be collected in accordance with our cookies policy which is set out in this document;
  - details of your visits to our site/s and/or organisation and your preferences and habits when using our services; we will use this information to create a profile of you, for regulatory purposes and for the purpose of enhancing your customer experience with us; and
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), services you viewed or searched for, your conduct via the site and (where relevant) details of the fulfilment of any of your orders, and any other site activity, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

## How We Use Your information

We use information held about you in the following ways:

- **Information you give to us.**

We will use this information:

- to carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us;

- to send you a welcome/information email and to verify your account when you register on the site;
- to send you other emails/correspondence for the purposes of providing information on any services, products, competitions or promotions, including in relation to account management or system maintenance – this may include updates regarding our work and our on-going activities;
- to notify you about changes to our services and/or products including standards amendments; procedural and contractual updates;
- to provide customer support; and/or to seek your views on the services we provide; and / or
- to ensure that content from the site is presented in the most effective manner for you and for your computer.

Please note we will not use any financial or credit card information for any purpose other than to process payments by you for our products and services or due to you by agreement. We do not retain any credit card information electronically or manually. As soon as your credit card payment has been processed and verified, your credit card information is deleted and / or destroyed.

- **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 site, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- for data-matching purposes in respect of your use of our site / services and your use of certain third party services;
- to deliver (whether directly or indirectly via third parties) effective and personalised marketing material (where you have consented), and to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the sites;
- to measure, understand or monitor the effectiveness of advertising, promotions, marketing material and content and any joint initiatives with our affiliates, suppliers, partners, subcontractors and other selected third parties;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you where permitted; and / or
- to make suggestions and recommendations to you and other users of our site or services about goods or services that may interest you or them.

## **Using Your Information in Accordance with Data Protection Laws**

We rely on the following legal grounds to process your personal data:

- **Necessary for the entry into / performance of a contract:** When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under such contract, we will need to collect and process your personal information. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our services to you.
- **Legitimate interests:** To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. The effective operation of the organic inspection and certification process and associated activities involves a range of data processing activities.

## How Long We Keep Your Information For

We will retain your personal data for the period necessary to fulfil the purposes for which the information was collected. After that, we will delete it.

The retention period may vary depending on the purposes for which the information was collected. Where a specific legal or regulatory requirement applies to your personal data, we will retain it for the period of time specified in such legal or regulatory requirement. In the absence of a specific legal or regulatory requirement, we will retain your personal data for six years following the activity to which it relates (e.g. the relevant contract, enquiry, etc). We may be required to extend the retention period if the information is required due to a complaint or because it is required for litigation. Please also note that we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

If you are not a client, former employee, or Board Member and we have collected information about you (e.g. through an enquiry), this will be deleted within 12 months, unless we need to retain the information for regulatory purposes or if you are awaiting the re-opening of a government grant or other scheme so that this information can be conveyed to you.

## Disclosure of Your Information

We will not forward your information to third parties **for marketing** purposes.

We will only disclose your information to:

- government departments; statutory agencies; bodies indicated in the organic regulations relating to legislatively required exchange of information;
- suppliers and sub-contractors for the performance of any contract we enter into with them or with you;
- members of the public where you are a licensee and your name and contact information is requested to contact you about your produce and/or products;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and marketing materials;
- our regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts and any other authorised bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters etc.

Please note that organic regulations require that licences of all certified organic operators are published annually. To this end, we are legally obliged to upload the details of all organic licences onto the bioC platform [www.bioc.info](http://www.bioc.info).

## Marketing

We may use your personal information to contact you about other goods and services we offer that are similar to those that you have already purchased or enquired about.

You may withdraw your consent to the use of any of your personal information for **marketing** purposes, at any time by contacting us using the details below. You can also unsubscribe to Organic Trust news mailings (Organic Trust News E-newsletter) at any time by clicking the unsubscribe link at the bottom of the newsletter.

## Where We Store Your Personal Data

All information you provide to us is stored under secure storage in our offices and on our secure servers, or those of our suppliers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, 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.

## Your Rights

You have a number of rights under data protection law in relation to the way we process your personal data. These are set out below.

You may contact us using the details on our site or by contacting a member of Organic Trust CLG staff directly on +353 1 853 0271 to exercise any of these rights, and we will respond to any request received from you within one month from the date of the request – please indicate that your request relates to GDPR rights.

Please address any questions, comments and requests regarding our data processing practices to the CEO or IT Administrator, in the first instance. Responsibility for data protection in accordance with the requirements of the GDPR will be shared amongst senior personnel of Organic Trust CLG identified in the organisation's Quality Manual.

NUMBER	DESCRIPTION OF RIGHT
<b>Right 1</b>	A right to access personal data held by us about you.
<b>Right 2</b>	A right to require us to rectify any inaccurate personal data held by us about you.
<b>Right 3</b>	A right to require us to erase personal data held by us about you. This right <b>will only apply</b> where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).

- Right 4** In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
- Right 5** In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
- Right 6** A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).
- Right 7** A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

If you have any questions regarding this Policy and/or our privacy practices, please forward these to: Organic Trust CLG, Vernon House, 2 Vernon Avenue, Clontarf, Dublin D03 P6D0, Ireland. Alternatively, please telephone + 353 1 853 0271.

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Data Protection Commissioner. The Data Protection Commissioner's address is: Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois. Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +353 57 868 4757 | email [info@dataprotection.ie](mailto:info@dataprotection.ie)

## Changes to this Privacy Policy

We may make changes to our privacy policy from time to time, therefore, please check this page occasionally to ensure you are up to date with any changes or request a copy of the up to date Privacy Policy from the Organic Trust CLG.

This policy was last reviewed and updated on 23 May 2018.

## Definitions

A listing of definitions applicable to the GDPR is available; if any wording or terminology within this Privacy Policy requires clarification, please contact Organic Trust CLG for clarification.

## Cookie Policy

The Organic Trust CLG website ( [www.organictrust.ie](http://www.organictrust.ie) ) uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse our website and also allows us to improve the website.

**By continuing to browse the website, you are agreeing to our use of cookies as set out by this policy.**

## 1. Information about cookies

A cookie is a small file of letters and numbers that, if you agree to their use, is stored on your browser or the hard drive of your computer or device. They contain information that is transferred to your hard drive.

The cookies that we could use can be split into the following categories:

- **Necessary cookies.** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into parts of the website.
- **Analytical cookies.** These cookies allow us to recognise and count the number of visitors to the website and to see how they move around within the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.
- **Third party cookies.** These are used by third parties (such as Google) to enable their services to work, for example Google Captcha on forms or Google Maps. Some third parties use their cookies for advertising purposes. We have no control over these cookies and provide a link to the third party's privacy policy, where you may have the option to opt-out of their data collection.

## 2. The cookies we use

We use the following cookies:

Cookie name	Description
exp_last_visit	Sets the date/time that the user last visited the site, and is set for both guests and logged in users. If not set, is automatically set to 10 years ago.
exp_tracker	Tracks the last 5 pages viewed by the user, and is used primarily for redirection after logging in etc.
exp_last_activity	Every time the state is updated (the page reloaded) the last activity is set to the current date/time. Used to determine expiry.
exp_sessionid	A uniquely generated ID that corresponds to the session_id column in the exp_session table. Used when cookie and session are set as the session type.
exp_uniqueid	Matches the unique_id field in the exp_members table. Randomly generated by the functions class at registration.
exp_userhash	The encrypted password of the currently logged in user. Set if you choose the cookies and session ID method for sessions (cs in your config.)
exp_anon	A flag set by the user to determine if they are listed in the online users.

exp_expiration	Determines the length of the session for a logged in user. There are two options for this cookie: if the user has selected remember me then it is set to 1 year, and if not then it's set to the date/time that the user logged in.
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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.

### **3. How you can block cookies**

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

However, please be aware that blocking cookies may affect your ability to use the website and/or use it effectively. In particular, you may not be able to access all or parts of the website or use the functionalities contained therein.

This policy was last reviewed and updated on 12 09 2018.

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