

SENTRY LIMITED

2021 PRIVACY POLICY



SENTRY Ltd. PRIVACY POLICY

Introduction

Through your interactions and relationship with us you are trusting us with information that is important to you, and we want to be transparent about how we use it.

Here we describe the privacy practices for our products, services, and website, (the "Services"). We describe the data we collect, how we use it, your rights over your information, and the measures we take to keep it safe.

Any changes we make to our privacy notice in the future will be posted on our website. Please check back frequently to see any updates or changes to our privacy notice.

Updated: 14 April 2021

Effective: 7 June 2021

Information We Collect From You

We collect and process the following data about you:

- **Information you give us:** This includes information you provide when you:
 - Enter into a trading contract with us.
 - Provide information to us that is necessary and relevant to the delivery of our services.
 - Use of our website, including creating user accounts and passwords where these are required.
 - Subscribe to services offered by us or register for our events.
 - Register to receive downloadable information, newsletters, or other information.
 - Contact details when joining Sentry Analytics or other Advisory Services.
 - Join Product Services.
 - Send us a request to contact you.
 - Choose to share information with us by connecting your IT systems with our IT systems, for example, to share farm and crop data contained in your Crop Management systems.
- **Information we collect about you:** We collect information about you and your farm or business in a number of ways. These include:
 - Whilst performing our service or sales activities we will use and record your contact numbers, postal and email addresses.
 - Information we automatically capture when you visit and use our website. This includes the Internet Protocol (IP) address used to connect your computer to the

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Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform. We also collect information about your visit, including items you viewed or searched for, page response times, length of visits to certain pages and any phone number used.

How We Use Your Personal Information

We use information held about you in the following ways:

- To respond to queries that you may submit to us.
- To provide our services and products to you, as covered in our Terms and Conditions.
- To provide services and products to you on behalf of another party.
- To provide product and technical advice to you.
- To perform our business operations.
- To perform credit control and fraud management activities.
- To comply with relevant regulations, professional standards, and internal controls.
- To manage our customer and contact database.
- To perform direct marketing where we have consent.
- To operate our website and online services.
- To administer visits and events.

Legal Basis For Processing Your Information

We rely on several legal bases to process your information. These include:

- **Performance of, or entry into, a contract:** We process your personal data to allow us to deliver the services and products to you under our Terms and Conditions. We would not be able to deliver our services and products without this personal data.
- **Where we have a legitimate interest in doing so as a supplier of agronomy, seed, crop protection, nutrition, and precision farming services:** These legitimate interests include our interests in providing product and technical advice to our serviced customers, performing our business operations, performing credit control and fraud management activities, managing our customer and contact database, operating our online systems and websites, managing events and visits, and responding to queries.
- **Where we have your consent:** We use your personal data for certain direct marketing activities where we have your consent to do so. We may also share your data with selected third parties in-order for them to contact you about services complementary to our own. Each time we do this you will be asked for your explicit consent.
- **Compliance with legal obligations:** We use your personal data in-order to comply with relevant legislation.

Sharing Your Information

We do not rent or sell your personal information to any other organisation or individual.

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Where We Store Your Personal Data

We use a combination of technical, administrative, and physical controls to maintain the security of your data. Whilst no method of transmission or storage of data is completely secure, we do continually review, invest, and improve our security controls to address areas of risk. We store most of your data either on servers in our own data centre, or data centres operated by our Information Technology partners. This data is located and accessed by staff based in the UK or European Economic Area (EEA).

Retention Of Your Personal Data

We keep information about you and your use of our services for as long as necessary for our legitimate business interests, contractual and legal reasons.

We keep data about you for different retention periods dependent upon the nature of that data. For example:

- Information about your trading history with us, along with details of the technical advice we have provided, is retained for 8 years.
- Contact Information is removed from our contact database and mailing lists after 24 months if you have not opened our emails or clicked any links during that period.
- Information about your visits to our website is deleted after 26 months.

We may keep your data for longer than our stated retention period if we cannot delete it for legal, regulatory, or technical reasons.

Your Rights

You have the following rights:

- **The right to be informed:** You have the right to know about the personal data we collect and how we use it. This is covered in this Privacy Policy.
- **The right to access:** You may request access to any personal data we hold about you. Where requested, we will provide details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed.
- **The right to rectification:** You may ask us to correct any inaccurate or incomplete personal data we hold. You also have the right to restrict the processing of personal data whilst the accuracy is checked.
- **The right to erasure:** You may have the personal data we hold about you erased provided it is no longer necessary for the purposes it was collected.
- **The right to restrict processing:** You may ask us not to process your personal data for direct marketing purposes.
- **The right to data portability:** You may ask for the data we hold about you transferred to another data controller.
- **The right to object:** You may ask us not to process your personal data for direct marketing purposes or where processing is based on legitimate interest.

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You also have certain rights as to how your data is used for automated decision making and profiling. We do not process your data in this way.

You can exercise your rights, including making a subject access request, at any time by contacting us at sbs@sentry.co.uk.

You also have the right to make a complaint with the UK Information Commissioner's Office. For more details, please visit the ICO website.

Contact

If you have questions, suggestions or concerns about this policy, or about our use of your information, please contact us at sbs@sentry.co.uk.