

Privacy Notice

1. Purpose

The purpose of this Privacy Notice is to explain how Black Diamond Commodities Limited trading as BDC agri collects, uses, stores, shares and protects personal data.

BDC agri is a business-to-business organisation. Most of the information BDC agri processes is organisation data rather than personal data. However, BDC agri does process limited personal data where individuals act as business contacts, supplier contacts, customer contacts, employees, directors, applicants, contractors, professional advisers or website users.

This notice is intended to provide clear information about:

- what personal data BDC agri collects;
- how personal data is collected;
- why personal data is used;
- the lawful basis for using personal data;
- who personal data may be shared with;
- how long personal data is kept;
- what rights individuals have; and
- how individuals can contact BDC agri about data protection matters.

It contains:

- 1. Purpose**
- 2. Scope**
- 3. Who we are & how to contact us**
- 4. Personal data we collect**
- 5. How we collect personal data**
- 6. How we use personal data**
- 7. Lawful basis for processing**
- 8. Special Category & Criminal Offence Data**
- 9. Who we share personal data with**
- 10. International transfers**
- 11. How long we keep personal data**
- 12. Cookies & website analytics**
- 13. Your rights**
- 14. Automated decision-making**
- 15. Complaints**

16. Review

2. Scope

This Privacy Notice applies to personal data processed by BDC agri in relation to:

- customers and customer contacts;
- suppliers and supplier contacts;
- prospective customers and business contacts;
- website users and people who submit enquiries;
- employees, directors, applicants and contractors;
- professional advisers and service providers; and
- any other individual whose personal data is processed by BDC agri in the course of its business activities.

This notice applies to personal data held electronically or in paper form.

It does not apply to organisation data that does not identify a living individual.

3. Who we are & how to contact us

Black Diamond Commodities Limited trading as BDC agri is the controller of the personal data described in this Privacy Notice.

This means BDC agri is responsible for deciding how and why personal data is processed.

- **Registered company name:** Black Diamond Commodities Limited
- **Trading name:** BDC agri
- **Company number:** 06821585
- **Registered office:** Unit 70 Hunthay Business Park, Axminster, Devon, UK, EX13 5RJ
- **ICO registration number:** ZC185120
- **Data protection contact:** Juliet Dunn
- **Email:** juliet@bdc-agri.com

Any questions about this Privacy Notice, personal data processing, rights requests or data protection complaints should be sent to the Data Protection Officer using the contact details above.

4. Personal data we collect

The personal data BDC agri collects is usually limited to what is needed for normal business, employment and legal purposes.

Business contacts, customers and suppliers

BDC agri may collect:

- name;
- job title;
- employer or organisation;
- work email address;
- work telephone number;
- workplace address;
- correspondence;
- meeting notes or action points;
- order, supplier or customer contact history;
- professional relationship information; and
- occasional photographs, where relevant.

Employees, directors, applicants and contractors

BDC agri may collect:

- name and contact details;
- date of birth, where required;
- employment or role information;
- payroll, tax, pension and bank details;
- right to work information;
- emergency contact details;
- sickness, absence, performance and training records;
- recruitment information, such as CVs, applications, interview notes and references; and
- information required for employment, company administration or legal compliance.

Website users and enquirers

BDC agri may collect:

- information submitted through website forms;
- email enquiry information;
- contact details provided by the individual;
- basic website analytics information; and
- cookie data, where applicable.

5. How we collect personal data

BDC agri may collect personal data:

- directly from the individual;
- from the individual's employer or organisation;
- from customers, suppliers or business partners;
- from public sources, such as company websites, Companies House, LinkedIn or trade directories;
- from recruitment agencies or referees;
- through the BDC agri website, email systems or business systems; and
- from professional advisers or service providers.

6. How we use personal data

BDC agri may use personal data to:

- manage customer, supplier and business relationships;
- respond to enquiries;
- manage orders, purchases, invoices and payments;
- arrange meetings, events, deliveries or site visits;
- communicate with business contacts;
- maintain business records;
- manage employees, directors, applicants and contractors;
- operate payroll, tax, pension, HR and company administration processes;
- comply with legal and regulatory obligations;
- manage complaints, disputes, insurance matters or legal claims;
- maintain IT and information security;
- manage the BDC agri website and respond to website enquiries; and
- carry out marketing or business development where lawful and appropriate.

7. Lawful basis for processing

BDC agri only uses personal data where it has a lawful basis to do so.

Depending on the circumstances, BDC agri may rely on:

- **Contract:** where processing is necessary to enter into or perform a contract.
- **Legal obligation:** where processing is necessary to comply with the law.

- **Legitimate interests:** where processing is necessary for BDC agri's legitimate business interests, provided those interests are not overridden by the individual's rights and freedoms.
- **Consent:** where consent is appropriate and has been freely given.

For most business contact data, BDC agri usually relies on legitimate interests because it needs to communicate with people in a business context.

For employee, payroll, tax and company administration data, BDC agri may rely on contract, legal obligation or legitimate interests depending on the purpose.

Where BDC agri relies on consent, the individual can withdraw that consent at any time by contacting the data protection contact using the details in 3. Who are we & how to contact us.

8. Special Category & Criminal Offence Data

BDC agri:

- does not routinely process special category personal data or criminal offence data;
- may process limited special category data where necessary for employment, sickness absence, health and safety, reasonable adjustments or legal compliance; and
- will only process criminal offence data where necessary and lawful, for example where required for employment checks or legal compliance.

9. Who we share personal data with

BDC agri may share personal data where there is a lawful and legitimate reason to do so.

Personal data may be shared with:

- IT, email, hosting and software providers;
- accountants, payroll providers, banks and payment providers;
- professional advisers, such as lawyers, insurers and consultants;
- customers, suppliers, logistics providers and business partners;
- recruitment, HR, pension or employment-related service providers;
- regulators, public authorities, courts or law enforcement where required; and
- other third parties where sharing is necessary and lawful.

Where a third party processes personal data on behalf of BDC agri, BDC agri will ensure appropriate contractual protections are in place.

10. International transfers

Some software providers or service providers may process personal data outside the UK.

Where this happens, BDC agri will ensure that appropriate safeguards are in place, such as adequacy regulations, international data transfer agreements, standard contractual clauses, a UK addendum or another lawful transfer mechanism.

11. How long we keep personal data

BDC agri only keeps personal data for as long as necessary.

Retention periods depend on the type of data, the reason it was collected, business need, legal requirements, accounting or tax rules, contractual requirements, and whether the data may be needed for complaints, disputes or legal claims.

When personal data is no longer needed, BDC agri will delete it, destroy it securely or anonymise it.

12. Cookies & website analytics

The BDC agri website may use cookies or similar technologies.

Cookies may be used for:

- website functionality;
- security;
- analytics;
- performance monitoring; and
- marketing, where applicable.
- Where required, BDC agri will ask for consent before using non-essential cookies.

More information is available in the BDC agri Cookie Policy.

13. Your rights

Individuals have rights in relation to their personal data. Depending on the circumstances, these may include the right to:

- be informed about how their personal data is used;
- access their personal data;
- correct inaccurate or incomplete data;
- request deletion of their data;
- restrict certain processing;

- object to certain processing;
- request data portability;
- withdraw consent, where BDC agri relies on consent; and
- challenge certain automated decisions, where applicable.

These rights are not absolute and may not apply in every circumstance.

Individuals who wish to exercise their rights should contact the data protection contact using the details in [3: Who We Are & How to Contact Us](#).

BDC agri may need to verify the individual's identity before responding to a request.

14. Automated decision-making

BDC agri does not currently use personal data to make solely automated decisions that produce legal or similarly significant effects.

15. Complaints

Individuals who are concerned about how BDC agri uses their personal data should contact the data protection contact using the details in 3. Who are we & how to contact us.

BDC agri will acknowledge data protection complaints within 30 days and respond without undue delay.

Individuals also have the right to complain to the Information Commissioner's Office.

16. Review

This Privacy Notice will be reviewed at least annually, or sooner if there are significant changes to BDC agri's business activities, website functionality, systems, suppliers, legal obligations, regulatory requirements or operational risks.