



**Privacy Policy in relation to the General Data Protection Regulation, enforced
25th May 2018 & reviewed 1st July 2024.**

Data protection officer: Mr Andrew Low

1. How Discussing Business Ltd uses data

- i) Discussing Business Ltd operates B2B and does not ever approach consumers directly. It does however, contact named personnel within companies and so is affected by GDPR legislation.
- ii) This company offers consultancy and trading relationships with defined customers. It operates under the control of formalised agreements through one of the below types of contract that are taken to be one of the lawful bases of contact that are permitted:
 - a. Non-Disclosure Agreement – early in the business association before an agreement has been signed. This protects all confidential information of all parties and is taken as formal acceptance that a relationship exists and that the other party is happy to receive communication from us.
 - b. Distribution or Agency contract – by definition, this sets-out the details of a business relationship that demands regular, two-way communication of all forms.
 - c. Consultancy Agreement – details the terms of assistance offered to the customer that demands regular, two-way communication of all forms.
 - d. Engagement Letter – details the tasks required and the terms of any assistance to be given to the customer that will demand regular, two-way communication at least during the period of contract.
- iii) It is sometimes necessary to approach potential customers, typically by email and often to a named employee. At this stage there is no form of contract in place and so consent must be sought. It is proposed that from 25th May 2018 any such speculative approach will include the following statement in a prominent position:
 - i. ‘Discussing Business Ltd is sending this communication relying on the assumed, mutual *Legitimate Interest* to both companies. If you do not believe that future discussion is of use to the company that you represent please confirm in writing, by return that you wish to cancel further contact’.



- iv) The company has access to a database of Contacts in Outlook and on a mobile phone that includes many people that are known to Andrew Low (Owner of Discussing Business Ltd) from his career in Agriculture. On the rare occasion that contact will be made with such old contacts the same statement will be made as in (iii) to allow for informed consent.
- v) The company does not intend to buy contact data for consumers (farmers) at any time and does not currently have any such information stored. It does not operate a CRM system.

2. Right to access & control

- (i) If requested, the company will create a pdf document that details all information kept on any customer. This will typically include names, contact details for personnel and all contracts in-place.
- (ii) If asked, the company is prepared to amend any inaccuracies in the data held about a customer.
- (iii) If asked, the company is prepared to restrict the use of any data held by a customer.
- (iv) If asked, the company is prepared to delete all such records, electronic and hard-copy except where they need to be kept for official purposes such as VAT invoices or in the case of NDA's, where the document is needed to protect Discussing Business Ltd and its data.

Last reviewed: 01/07/2024.