



## **WSRO Privacy Policy for Members and Website Users**

### **Introduction**

World Sugar Research Organisation ("WSRO") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website and how the law protects you.

### **Important information and who we are**

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how WSRO collects and processes your personal data through your use of this website, including any data you may provide when you become a Member of the WSRO.

It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### **Controller**

World Sugar Research Organisation Limited is the controller and responsible for your personal data (collectively referred to as "WSRO", "we", "us" or "our" in this privacy policy). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Full Name: Sarah Shea

Email Address: [info@wsro.org](mailto:info@wsro.org)

Postal Address: Salisbury House, Station Road, Cambridge CB1 2LA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **Changes to the privacy policy and your duty to inform us of the changes**

Our privacy policy is amended from time to time as we keep this under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **Third-party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.



### **The data we collect about you**

Personal data, or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your full name, role, organisation and committee and working groups you join.
- **Contact Data** includes email addresses, telephone numbers, billing and delivery addresses.
- **Profile Data** includes your username and password.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

We will not collect any **Special Categories of Personal Data** about you this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **How is your personal data collected**

We use different methods to collect data from and about you including through:

- **Direct Interactions.** You may give us your identity, contact and financial data by filling in membership forms or by correspondence with us by post, phone, email or otherwise.
- **Automated Technologies or Interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy link for further details.



### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights to not override those interests
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

### **Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We may share your personal data with third parties such as SRO Accountants, Legal Advisors, to complete end of year accounts, perform day-to-day finance operations, and to ensure we are compliant with current legislation. We may also share your personal data with Website & IT Support Companies to resolve technical issues and enhance our users experience.

### **International transfers**

In limited and necessary circumstances, your information may be transferred outside of the EU/UK or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards including ensuring that the companies we work with are UK Data Protection Act 2018 (DPA) and EU General Data Protection Regulations (GDPR) compliant. In particular, that the data held is deemed to be compliant with meeting both UK and international data requirements.

Please contact us if you want further information on the specific mechanism used by use when transferring your personal data out of the UK.



### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who has a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **How long will you use my Personal Data for?**

We will only retain your personal data for as long as reasonable necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Member details are kept for the duration of which the organisation or individual represented is associated with the WSRO and lapsed member details are then kept for a further 5 years after cancellation.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances, you can ask us to delete your data: see *Your rights* below for further information. In some cases we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Your rights**

Under The Data Protection Act 2018 and the EU's General Data Protection Regulation (GDPR), you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

This policy was last reviewed and updated in September 2023.