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|  | <b>Dairygold Co-Operative Society Limited<br/>Policy</b> |                   |
|   | <b>Policy Number</b>                                     | <b>LG-PS-005</b>  |
| <b>Policy Title</b>   | <b>Dairygold Privacy Policy</b>                          |                   |
| <b>Element</b>  | <b>Legal</b>   |                   |
| <b>Tier</b>   | <b>Corporate</b>   |                   |
| <b>Effective Date</b>   | <b>25<sup>th</sup> May 2018</b>                          | <b>Revision 1</b> |

## Contents

|     |   |    |
|-----|---|----|
| 1.  | <b>Scope of this Privacy Policy</b> .....                         | 4  |
| 2.  | <b>Personal Data the Society Process</b> .....                    | 4  |
| 3.  | <b>How the Society uses Personal Data</b> .....                   | 4  |
| 4.  | <b>Responsibility for Personal Data</b> .....                     | 5  |
| 5.  | <b>Sharing of Personal Data</b> .....                             | 6  |
| 6.  | <b>International Transfers of Personal Data</b> .....             | 6  |
| 7.  | <b>Security of Personal Data</b> .....                            | 6  |
| 8.  | <b>Legal Justifications for Processing of Personal Data</b> ..... | 7  |
| 9.  | <b>Monitoring</b> .....   | 8  |
| 10. | <b>Retention of Personal Data</b> .....                           | 8  |
| 11. | <b>Personal Data Rights</b> .....                                 | 9  |
| 12. | <b>Who to contact about Personal Data</b> .....                   | 9  |
| 13. | <b>Review and Revision</b> .....                                  | 9  |
|     | <b>SCHEDULE 1 Definition of key data protection terms</b> .....   | 10 |
|     | <b>SCHEDULE 2 Types of Personal Data</b> .....                    | 11 |
|     | <b>SCHEDULE 3 Third Party Disclosers</b> .....                    | 13 |
|     | <b>SCHEDULE 4 Legal Bases for Processing</b> .....                | 14 |
|     | <b>SCHEDULE 5 Data Subject (Individual) Rights</b> .....          | 16 |

## Introduction and Purpose of this Policy

Dairygold Co-Operative Society Limited and its subsidiaries (the “Society” or “Dairygold”) as Data Controllers, collect, use, share and hold certain Personal Data about current, past and prospective, members, customers, suppliers, business contacts and other people in course of its business activities. Personal Data must be Processed in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) and other applicable national and European privacy legislation and regulations (together the “Data Protection Law”).

The Society recognises the need to treat Personal Data in an appropriate and lawful manner and is committed to complying with its obligations in this regard. This Privacy Policy explains how the Society uses Personal Data as Data Controllers.

This Privacy Policy applies to all entities within the Society and all individuals who work for, with or on behalf of any Dairygold business.

The Society uses the words Personal Data to describe information about an individual, from which they are identifiable. Other key data protection terms are defined in Schedule 1.

## Responsibilities

Dairygold has a responsibility to ensure that Personal Data is:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept for no longer than is necessary for the purposes for which the Personal Data are processed; and
- processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## Associated or Relevant Documentation

| Number | Title | Location |
|--------|-------|----------|
|        |       |          |
|        |       |          |
|        |       |          |

## 1. **Scope of this Privacy Policy**

The Society's use of Personal Data includes Personal Data obtained from a variety of sources, including:

- Company forms and documentation;
- telephone calls, emails and other communications;
- service providers and other third parties;
- the Dairygold website(s) (the "Site"); and
- social media applications.

In this Privacy Policy, the Society refers to the Site and our social media applications collectively as our "**Online Tools**".

Personal Data may be provided to the Society by the individual directly or by a third party.

This Privacy Policy may be supplemented by other privacy notices tailored to the Society's specific relationships with the individual.

## 2. **Personal Data the Society Process**

The Personal Data the Society holds about individuals may differ depending on the relationship, including the type of communications between the Society and the individual and the services the Society provides.

The Personal Data the Society collects generally falls within one of four categories – Personal Data about:

- Members;
- Suppliers;
- Business Contacts; and
- Customers.

Examples of the Personal Data the Society may hold and process is further described in Schedule 2.

## 3. **How the Society uses Personal Data**

The Society uses Personal Data to carry out its business activities. The purposes for which the Society uses an individual's Personal Data may differ based on the relationship, including the type of communications between the Society and the individual and the services the Society provides.

The Society's business includes the following:

Processing Personal Data in the context of the Society's Membership, Milk and Grain Supply, Retail and Agri business in order to:

- facilitate general business purposes, including administering its share register and membership, processing payments;
- provide products and services;
- maintain and improve the quality of products and services, provide training and maintain information security (for example, for this purpose the Society may record or monitor phone calls);
- comply with its legal obligations in relation to its membership and milk and grain supply;
- communicate with individuals, facilitate communication between customers with a supplier or third-party advisors;
- administer participation in competitions, including those offered in conjunction with third parties.

In respect of the Society's operations generally, including with respect to the above business activities, the Society also Processes Personal Data to:

- carry out research and analysis, including analysis of the Society's customer base or membership and other individuals whose Personal Data the Society collect;
- provide marketing information in accordance with preferences the individual has told the Society about (marketing information may be about products and services offered by third party partners subject to the individual's preferences);
- personalise the individual's experience when using Online Tools or visit third party websites by presenting information and advertisements tailored to the individual, and facilitate sharing on social media;
- manage the Society's business operations and IT infrastructure, in line with its internal policies and procedures, including those relating to finance and accounting, billing and collections, IT systems operation, data and the website hosting, data analytics, business continuity, records management, document and print management, and auditing;
- manage complaints, feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to Personal Data;
- comply with applicable laws and regulatory obligations; comply with legal process and court orders; and respond to requests from public and government authorities; and
- establish and defend legal rights to protect the Society's business operations, and those of its business partners.

#### 4. **Responsibility for Personal Data**

The Society is responsible for looking after Personal Data in accordance with this Privacy Policy, internal standards and procedures, and the requirements of data protection law.

When the Society provide Personal Data to third parties as Data Processors, the third parties will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Data. In such circumstances, the Society will disclose requested Personal Data to the extent permitted by, and in accordance with, applicable Data Protection Law. Those third parties will assume certain responsibilities under data protection law for looking after the Personal Data that they receive from the Society.

## 5. **Sharing of Personal Data**

In connection with the purposes described above, the Society may need to share Personal Data with third parties (this may involve third parties disclosing Personal Data to the Society and the Society disclosing Personal Data to them).

The types of third parties with which the Society may share Personal Data are further described in Schedule 3. Certain of these third parties are Data Processors.

In certain circumstances, Data Protection Law allows Personal Data to be disclosed to law enforcement agencies without the consent of the individual. In such circumstances, the Society will disclose requested Personal Data to the extent permitted by, and in accordance with, applicable Data Protection Law. Prior to any such disclosure of Personal Data the Society will ensure the request is legitimate and in accordance with Data Protection Law, seeking assistance from Group Legal Counsel where necessary.

## 6. **International Transfers of Personal Data**

For the purposes set out in this Privacy Policy the Society may transfer Personal Data internationally to its service providers, business partners, and government or public authorities, some of whom may be located in other countries (including countries which have not been found by the European Commission to provide adequate protection for Personal Data).

When making these transfers, the Society will take steps to ensure that the Personal Data is adequately protected and transferred in accordance with Data Protection Law.

This may involve the use of data transfer agreements in the form approved by the European Commission or another mechanism recognised by Data Protection Law as ensuring an adequate level of protection for Personal Data transferred outside the EEA (for example, the standard contractual clauses).

For further information about these transfers and to request details of the safeguards in place, please contact the Society using the details in paragraph 12 below.

## 7. **Security of Personal Data**

The Society uses appropriate technical, physical, legal and organisational measures, which comply with Data Protection Law to keep Personal Data secure.

As much of the Personal Data the Society holds is stored electronically the Society has implemented appropriate IT security measures to ensure this Personal Data is kept secure. For example, the Society may use anti-virus protection systems, firewalls, and data encryption technologies. The Society have procedures in place at our premises to keep any hard copy records physically secure. The Society also train its staff regularly on data protection and information security.

When the Society provides Personal Data to a third party (including its service providers) or engages a third party to collect Personal Data on its behalf (Data Processor), the third party will be selected carefully and required to use appropriate security measures to protect the confidentiality and security of Personal Data.

Unfortunately, no data transmission over the Internet or electronic data storage system can be guaranteed to be 100% secure. If an individual has reason to believe that their interaction with the Society is no longer secure (for example, if they feel that the security of any Personal Data sent to the Society has been compromised), they should immediately notify the Society.

## 8. **Legal Justifications for Processing of Personal Data**

To comply with Data Protection Law, the Society need to describe the legal justification it relies on for using Personal Data for its purposes. While the law provides several legal justifications, the table in Schedule 4 describes the main legal justifications that apply to the purposes for using Personal Data.

Certain Personal Data obtained from an individual is needed by the Society, in order for the Society to comply with applicable legal requirements, to fulfil the terms of its contract with an individual, to admit an individual as a member of the Society, or in preparation of entering into a contract with an individual. The Society may inform the individual of this at the time that the Society obtains the Personal Data. In these circumstances, if the individual does not provide the relevant Personal Data to the Society, the Society may not be able to provide its products or services to the individual or admit the person as a member of the Co-Op.

Where the Society relies on its legitimate business interests or the legitimate interests of a third party to justify the purposes for using Personal Data, its legitimate interests are:

- pursuit of its commercial activities and objectives, or those of a third party (for example, by carrying out direct marketing and otherwise for the purposes set out in this policy);
- compliance with any industry or regulatory guidelines or standards (for example, for the purpose of food safety);
- improvement and development of business operations and service offering, or those of a third party;
- protection of the business, shareholders, employees and customers, or those of a third party (for example, ensuring IT network and information security, enforcing or defending claims, including debt collection); and
- financing of the Society (e.g. sales of debts or loans);
- analysing the Society's services (for example, by carrying out research, including market research).

The Society may also Process Personal Data for the purpose of complying with its legal obligations from time to time.

Where you have provided your consent to the Processing of your Personal Data, the Society shall continue to Process such Personal Data until you withdraw this consent, which you may do at any time (for example, in relation to receiving marketing communications). Any

additional consents required by law will be specifically requested from you at the time of Processing the relevant Personal Data.

For Processing of more Sensitive Personal Data, the Society will rely on either:

- consent;
- that use of Sensitive Personal Data is necessary for the establishment, exercise or defence of legal claims or prospective legal claims or in the context of legal proceedings or prospective legal proceedings, or whenever courts are acting in their judicial capacity (for example, when a court issues a court order requiring the Processing of Personal Data); or
- where such Sensitive Personal Data is manifestly publicised by you.

Processing of Personal Data relating to criminal convictions and offences is subject to the requirements of applicable law and is not Processed by the Society in the ordinary course unless such Personal Data is required to be Processed in the context of us performing, or entering into, a contract with you or where required for the investigation of a suspected criminal offence.

## 9. **Monitoring**

We may record your telephone calls so that the Society can:

- improve the standard of service that the Society provide by providing employees with feedback and training, where applicable; and
- address queries, concerns or complaints.

In the event that the Society records these calls, you shall be advised of this at the outset of the call.

The Society monitors electronic communications between the Society and third parties (for example, emails) to protect the employees, the business and IT infrastructure, and third parties including by:

- identifying and dealing with inappropriate communications; and
- looking for and removing any viruses, or other malware, and resolving any other information security issues.

The use of CCTV involves Processing of Personal Data. CCTV is used at entry and exit points at our premises which are identified by signage. CCTV images may be used to investigate a suspected criminal offence, such as theft, fraud, criminal damage or assault or any serious complaint or allegation received where the Processing of such Personal Data is necessary and proportionate to the investigation of that complaint or allegation.

## 10. **Retention of Personal Data**

The Society will keep Personal Data for as long as is necessary for the purposes for which the Society collects it. This means the Society will retain Personal Data for so long as we have a relationship with the individual to whom the Personal Data relates. Once this relationship comes to an end the Society will retain such Personal Data for a period of time that allows it



to: (a) comply with legal record retention requirements; (b) defend or bring legal claims; (c) maintain records for business analyses and audit; and (d) address complaints and other issues regarding its business.

Where the Society holds Personal Data to comply with a legal or regulatory obligation, the Society will keep the information for at least as long as is required to comply with that obligation. In some cases a retention period will apply once the initial purpose has ceased e.g. payment files are required to be kept for current year plus 6 years.

Where the Society holds Personal Data in order to provide a product or service, the Society will keep the information for at least as long as the Society provides the product or service, and for a number of years thereafter. The number of years varies depending on the nature of the product or service provided.

For further information about the period of time for which the Society retains Personal Data, please contact the Society using the details in Section 12.

#### **11. Personal Data Rights**

Schedule 5 sets out a summary of the data protection rights available to individuals in the EU in connection with their Personal Data. These rights may only apply in certain circumstances and are subject to certain legal exemptions.

To exercise any of these rights, please contact the Society using the details set out below.

#### **12. Who to contact about Personal Data**

For any questions or concerns about the way the Society uses Personal Data, please contact the Society at [dataprotection@dairygold.ie](mailto:dataprotection@dairygold.ie).

#### **13. Review and Revision**

The Society reviews this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in the business, legal requirements, and the manner in which the Society process Personal Data. This Privacy Policy was last updated on the date indicated on page 1. The Society may review this policy and make changes from time to time.

**SCHEDULE 1**  
**Definition of key data protection terms**

**“Data Controller”** means the entity that controls Personal Data, by deciding why and how such Personal Data is Processed.

**“Data Processor”** means the party that Processes Personal Data on behalf of the Data Controller (for example, a service provider to the Controller).

**“European Economic Area”** or **“EEA”** means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK (until the date of its exit from the EU), Iceland, Liechtenstein, and Norway.

**“Personal Data”** is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual’s location; or
- any other information that is specific to that individual.

**“Processing”** includes collecting, using, recording, organising, altering, disclosing, destroying or holding Personal Data in any way. Processing can be done either manually or by using automated systems such as information technology systems and **“Process”** and **“Processing”** shall be interpreted accordingly.

**“Sensitive Personal Data”** are types of Personal Data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special Categories of Personal Data also include the Processing of genetic data, biometric data (for example, fingerprints or facial images), health data and data concerning sex life or sexual orientation.

**SCHEDULE 2**  
**Types of Personal Data**

| Type of Personal Data                           | Examples  |
|---|---|
| <b>Information on Categories of Individuals</b> | <p><b>Details of Members/Customers/Tenants/ Suppliers:</b></p> <ul style="list-style-type: none"> <li>• Contact Information (see below)</li> <li>• Government documents (see below) – for age and ID verification which may contain some or all of the following: gender, date and place of birth, physical characteristics, ID number.</li> <li>• Data Relating to Milk Supply (see below)</li> <li>• Financial Information (see below), details of payments</li> <li>• marital and family status, details of beneficiaries on death of member or transfer of membership interest in Co-Op (which may include information revealing sexual orientation being Sensitive Personal Data)</li> <li>• Status as Society officer or director, or partner, or other ownership or management interest in an organisation which is a member of the Co-Op</li> <li>• Marketing Preferences; Marketing Activities and Customer feedback (see below)</li> <li>• Government documentation.</li> </ul> |
| <b>Contact information</b>                      | <ul style="list-style-type: none"> <li>• Name, address, email and telephone number.</li> </ul>  |
| <b>Data Relating to Milk Supply</b>             | <ul style="list-style-type: none"> <li>• Copy leases of land (for quotas) – to verify that the relevant land is part of Co-Op catchment area</li> <li>• herd number, milk account number</li> <li>• documentation relating to milk quotas that ended in 2015 and details of acquisitions and transfers of quota – transfer of quota or various schemes, all of which are form-based, transfers of land with quota (quota transfers with land) historic data in terms of transfers of quota, milk volume data</li> </ul>   |

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|  | <ul style="list-style-type: none"> <li>• verification of register of milk suppliers against register of members.</li> </ul>  |
| <b>Government</b>  | Social security number, passport number, tax number, driver's licence number, or other government issued identification number.  |
| <b>Financial information</b>   | Payment card number (credit /debit card), bank account number, other financial account number and account details, other financial information including amounts owed or owing and credit terms.   |
| <b>Marketing preferences, marketing activities and customer feedback</b> | Marketing preferences (including profiling by reference to your interests or business activities) or responses to customer satisfaction surveys.   |
| <b>Online activity information</b>                                       | The Society may receive Personal Data about an individual when they use Online Tools; this may include social media account identifiers, IP address and other online identifiers (to the extent that they are Personal Data), and other Personal Data that an individual may provide to the Society online.  |
| <b>Supplemental information from other sources</b>                       | The Society and its service providers may supplement the Personal Data the Society collects with information obtained from other sources (for example, publicly available information from online information resources and social media sites or apps, third party commercial information sources, and information from its business partners or Government authorities). |

**SCHEDULE 3**  
**Third Party Disclosers**

| <b>Type of third party</b>               | <b>Examples</b>   |
|--|---|
| <b>Service providers and advisors</b>    | External third party service providers, such as security professionals, accountants, auditors, experts, lawyers and other professional advisors; travel assistance providers; call centre service providers; IT systems, support and hosting service providers; advertising, marketing and market research, and data analysis service providers; banks and financial institutions that service the Society's accounts; document and records management providers; and other third party vendors and outsourced service providers that assist the Society in carrying out business activities. |
| <b>Government / Judicial authorities</b> | The Society may also share Personal Data with:<br><br>(a) government, semi-State or other public authorities (including, but not limited to, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies) to the extent Personal Data is required to be disclosed; and<br><br>(b) third party participants in legal proceedings and their accountants, auditors, lawyers, and other advisors and representatives, as the Society believe to be necessary or appropriate.  |
| <b>Other third parties</b>               | Accountants, lawyers, tax advisers or advisers acting on behalf of relevant individual; industry bodies; joint venture partners; financial institutions (in the context of sales of debts or loans); insurance companies (in the context of legal claims or proceedings).   |

**SCHEDULE 4**  
**Legal Bases for Processing**

| Purpose of Processing   | Legal Justifications |                       |                   |                      |  |
|---|----------------------|-----------------------|-------------------|----------------------|--|
|   | Consent              | Contractual Necessity | Legal Requirement | Legitimate Interests | Necessary for exercising, establishing or defending a legal claim or in context of legal proceedings |
| To communicate with individuals   |                      | ●                     | ●                 | ●                    |  |
| To provide products and services  |                      | ●                     |                   | ●                    |  |
| To administer the shareholding of the Society   | ●                    | ●                     | ●                 | ●                    |  |
| To improve the quality of the Society's products and services, for training, and to maintain information security |                      |                       | ●                 | ●                    |  |
| To manage commercial risks  |                      |                       | ●                 | ●                    |  |
| To carry out research and analysis  | ●                    |                       |                   | ●                    |  |
| Legal claims, potential legal claims, legal proceedings or prospective legal proceedings                          |                      | ●                     | ●                 | ●                    | ●  |
| To provide marketing information  | ●                    |                       |                   | ●                    |  |

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| To manage the Society's business operations and IT infrastructure |   | ● | ● | ● |  |
| To manage complaints, feedback and queries                        |   | ● | ● | ● |  |
| To comply with applicable laws and regulations                    |   |   | ● | ● |  |
| To personalise the user experience when using Online Tools        | ● |   |   | ● |  |

**SCHEDULE 5**  
**Data Subject (Individual) Rights**

| Description   | When is this right applicable?  |
|---|---|
| <p><b>Right of access to Personal Data</b></p> <p>Individuals have the right to receive a copy of the Personal Data the Society holds about them and information about how the Society use it.</p>  | <p>This right is applicable at all times when the Society hold individual's Personal Data (subject to certain exemptions).</p>  |
| <p><b>Right to rectification of Personal Data</b></p> <p>An individual has the right to ask the Society to correct Personal Data the Society holds about the individual where it is incorrect or incomplete.</p>  | <p>This right is applicable at all times when the Society hold individual's Personal Data (subject to certain exemptions).</p>  |
| <p><b>Right to erasure of Personal Data</b></p> <p>This right entitles an individual to request that their Personal Data be deleted or removed from the Society's systems and records. However, this right only applies in certain circumstances.</p>   | <p>Examples of when this right applies to Personal Data the Society holds include (subject to certain exemptions):</p> <ul style="list-style-type: none"> <li>• when the Society no longer needs the Personal Data for the purpose the Society collected it;</li> <li>• if the individual withdraws consent to the Society's use of their information and no other legal justification supports the continued use of their information;</li> <li>• if an individual objects to the way the Society uses their information and the Society has no overriding grounds to continue using it;</li> <li>• if the Society has used an individual's Personal Data unlawfully; and</li> <li>• if the Personal Data needs to be erased for compliance with law.</li> </ul> |
| <p><b>Right to restrict processing of Personal Data</b></p> <p>An individual has the right to request that the Society suspend the use of their Personal Data.</p> <p>Where the Society suspends its use of the individual's Personal Data the Society will still be permitted to store their Personal Data, but any other use of this information will require their consent, subject to certain exemptions.</p> | <p>An individual can exercise this right if:</p> <ul style="list-style-type: none"> <li>• they think that the Personal Data the Society holds about them is not accurate, but this only applies for a period of time that allows the Society to consider if the Personal Data is in fact inaccurate;</li> <li>• the Processing is unlawful and the individual opposes the erasure of</li> </ul>   |



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|  | <p>their Personal Data and request the restriction of its use instead;</p> <ul style="list-style-type: none"> <li>• the Society no longer needs the Personal Data for the purposes the Society has used it to date, but the Personal Data is required by the individual in connection with legal claims; or</li> <li>• the individual has objected to the Society's processing of the Personal Data and the Society is considering whether its reasons for processing override the individual's objection.</li> </ul> |
| <p><b>Right to data portability</b></p> <p>This right allows an individual to obtain their Personal Data in a format which enables them to transfer that Personal Data to another organisation.</p> <p>An individual may have the right to have their Personal Data transferred by the Society directly to the other organisation, if this is technically feasible.</p>  | <p>This right will only apply:</p> <ul style="list-style-type: none"> <li>• to Personal Data the individual provided to the Society;</li> <li>• where the Society has justified their use of the individual's Personal Data based on: <ul style="list-style-type: none"> <li>• the individual's consent; or</li> <li>• the fulfilment by the Society of a contract with the individual; and</li> </ul> </li> <li>• if the Society's use of the individual's Personal Data is by electronic means.</li> </ul>          |
| <p><b>Right to object to processing of Personal Data</b></p> <p>An individual has the right to object to the Society's use of their Personal Data in certain circumstances. However, the Society may continue to use their Personal Data, despite their objection, where there are compelling legitimate grounds to do so or the Society needs to use the Personal Data in connection with any legal claims.</p> |   |
| <p><b>Rights relating to automated decision-making</b></p> <p>An individual has the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects them (e.g. creditworthiness).</p>   | <p>This right is not applicable if:</p> <ul style="list-style-type: none"> <li>• the Society needs to make the automated decision in order to enter into or fulfil a contract with the individual;</li> </ul>   |

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|---|---|
| <p>This right means an individual can request that the Society involves one of its employees or representatives in the decision-making process.</p>   | <ul style="list-style-type: none"> <li>• the Society are authorised by law to make the automated decision; or</li> <li>• the decision is based on the individual's explicit consent.</li> </ul> |
| <p><b>Right to withdraw consent to processing of Personal Data</b></p> <p>Where the Society has relied upon an individual's consent to process their Personal Data, they have the right to withdraw that consent at any time.</p>   | <p>This right only applies where the Society process Personal Data based upon the individual's consent.</p>   |
| <p><b>Right to complain to the relevant data protection authority</b></p> <p>If an individual thinks that the Society has processed their Personal Data in a manner that is not in accordance with Data Protection Law, they can make a complaint to the data protection regulator. If they live or work in an EU member state, they may complain to the regulator in that state.</p> | <p>This right applies at any time.</p>  |