



## **WSRO Privacy Policy for Consultants & Contractors**

### **Introduction**

World Sugar Research Organisation ("WSRO") is committed to protecting personal data and complying with our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Policy explains how we collect, use, store, and share personal data. It applies to individuals we engage with, including external consultants, contractors, volunteers, and project collaborators.

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

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

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.



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

Depending on your relationship with us (e.g. as a consultant, or contractor), we may collect the following personal data:

- Full name
- Job title or professional role
- Organisation or company name
- Contact details (email, phone number, address)
- Contractual or invoicing information
- Project documentation or deliverables (if identifiable)
- Communication records (e.g. emails)
- Technical or device data (if interacting with our website) 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.

We do **not** routinely collect sensitive or "special category" personal data unless necessary for the project and with appropriate safeguards in place.

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 have to cancel an agreement we have with you, 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:

- Directly from you via email, forms, contracts /agreements
- Through interactions during project work or events
- From third parties (e.g. your employer or referring organisation)
- From public sources (e.g. websites or directories)

### **Purpose and Legal Basis for Processing**

We only process personal data where there is a valid legal basis. These include:

- Contractual necessity – to enter into or fulfil a contract with you
- Legal obligation – to meet regulatory or legal requirements
- Legitimate interests – in managing our organisation and activities effectively, where your rights are not overridden
- Consent – for optional uses where explicit consent is required



### **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 agreement we are about to enter into or have entered into with you.
- Manage project communications and deliverables.
- Maintain organisational records.
- Evaluate the impact and effectiveness of our work.
- Report to our members or regulatory bodies.
- Where we need to comply with a legal obligation.

### **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. Your personal data may be shared with our members.

We may also share your data with regulators or government bodies when legally required.

### **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.

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 August 2025.**