

Privacy Notice for Customer and Supplier Employees

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as an employee of our customers and suppliers, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) PROCESSING YOUR DATA

We will process your personal data for the purposes of communication with our customers and suppliers, ensuring any products or services exchanged between us satisfy agreed requirements and maintaining records. The legal basis for this processing is that it is necessary to achieve our legitimate interest, namely the supply of our products/services and maintaining a business relationship with your employer.

We will retain all personal data we have obtained relating to you for a maximum of 10 years to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

We will share your personal data with customers and suppliers only to the extent that the disclosure is reasonably necessary for the purposes of the supply of our products/services and maintaining a business relationship with you or your employer. We keep several categories of personal data on our prospective employees in order to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems, for example, recruitment logs.

Specifically, we hold the following types of data: personal details such as name, address, phone numbers.

C) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The activities requiring your data is to contact your employer in order to:

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- Discuss or enact the contract between them and ourselves. The legal basis is therefore fulfilment or creation of a contract
- Managing the day-to-day relationship between them and ourselves. The legal basis is therefore legitimate interest

D) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We do not carry out processing activities using special category data.

E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with your employer.

F) CRIMINAL CONVICTION DATA

We will not collect criminal conviction data.

G) WHO WE SHARE YOUR DATA WITH

In certain circumstances, we may share customer contact details with a supplier, and supplier contact details with a customer. This will only be done to service a contract between your employer and the third party (customer/supplier).

We do not share your data with bodies outside of the European Economic Area.

H) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) RETENTION PERIODS

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is six months to a year.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

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J) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

K) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Will Glanville (see below)

L) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

M) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Will Glanville
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01752 690400