

# Privacy Notice for Clients/Customers

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as prospective customers of our Company, 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) TYPES OF DATA HELD

We keep several categories of personal data on our prospective customers in order to carry out effective and efficient processes. We keep this data in the business management tool Zoho and company and we also hold the data within our computer system Zoho Work drive.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers, job title, company name, address, phone number etc.;
- b) company bank details and insurances;
- c) project data;
- d) your gender, marital status;
- e) your lead source (how we come into contact);
- f) the industry you work in
- g) what divisions of the company you work in;
- h) notes from any interactions with the company;
- i) your photograph;

## C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during a project from quoting to project completion.

In some cases, we will collect data about you from third parties, such as LinkedIn, Barbour ABI, Social Media Sites, Lists Providers, Search Engines

On some occasions we may collect and retain data that differs from what is stated in B) and C).

## D) LAWFUL BASIS FOR PROCESSING

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

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Normal running of the business (project work), e.g. contacting people, processing payment etc.	Legal obligation & day to day activities of the business, for the purpose of performance of the contact.
Marketing to you for potential business.	Our legitimate interests

## E) 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 carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

## F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into business with you and to continue to carry out business.

## G) WHO WE SHARE YOUR DATA WITH

Employees within our company will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons: for conducting our normal business activities.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us.

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, we will hold you data until it is no longer required e.g you retire or change industries, or ask for your data to be removed.

## **J) AUTOMATED DECISION MAKING**

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. We will make some decisions about you based on automated decision making (where a decision is taken about you using an electronic system without human involvement).

Decisions that are made automatically are those that relate to the normal running of the business, for example marketing activities (grouping customers, sending emails, interactions), sales, operations and accounting processes (automatic follow-ups, invoicing after stages). Decisions are relatively insignificant and little impact is had on the data.

## **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. 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 [admin@adexon-uk.com](mailto:admin@adexon-uk.com) or 0151 422 9111

## **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.