

WL Duffield & Sons Ltd – Privacy Policy.

This document demonstrates our commitment to protecting the privacy and security of your personal information. It contains information regarding how we collect and use personal data or personal information about you in accordance with the General Data Protection Regulation (GDPR) and all other data protection legislation currently in force.

Pursuant to that legislation, when processing data we will;

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be lost or destroyed or used for anything that you are not aware of or have consented to (as appropriate)

WL Duffield & Sons Ltd is a “data controller”. This means that we are responsible for determining the purpose and means of processing personal data relating to you.

- We do NOT sell your data to third parties

“Personal data”, or “personal information”, means any information relating to an identified, or identifiable individual in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

There are “special categories” of sensitive personal data, meaning data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sex life or sexual orientation, genetic data, and biometric data which require a higher level of protection.

DETAILS OF INFORMATION WE WILL HOLD ABOUT YOU

The list below identifies the kind of data that we will hold about you:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- date of birth
- gender
- marital status
- bank account details
- credit/debit card information and/or other payment information
- Credit Reference Checks
- CCTV footage
- Payroll Information
- Information relating to recruitment
- Any other personal information you choose to provide us with when you complete forms.

The following list identifies the kind of data that that we will process and which falls within the scope of “special categories” of more sensitive personal information:

- information about your health, including any medical conditions and disabilities
- information about criminal convictions and offences

METHOD OF COLLECTION OF PERSONAL INFORMATION

Your personal information is obtained through company forms which we will request you complete in order for us to obtain/provide a service or in order to fulfill a contract.

Further information maybe provided via third parties when we conduct a credit/background check.

Data may also be collected during the course of your engagement with us to enable its continued existence or development.

Personal data is kept in secure files, on our secured server and within our IT systems.

PROCESSING INFORMATION ABOUT YOU

Primarily we will collect information about you in order to provide you with the services that we are engaged in with each other.

We will only administer personal information in accordance with the lawful bases for processing. At least one of the following will apply when we process personal data:

- consent: You have given clear consent for us to process your personal data for a specific purpose.
- contract: The processing is necessary for a contract/service we have with you, or because we have asked you to take specific steps before entering into a contract.
- legal obligation: The processing is necessary for us to comply with the law (not including contractual obligations).
- vital interests: the processing is necessary to protect someone's life.
- public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We consider that the basis for which we will process the data contained in the list above is necessary for the performance of the contract we have with you and to enable us to comply with our legal obligations. Occasionally, we may process personal information about you to pursue legitimate interests of our own or those of third parties, provided there is no good reason to protect your interests and your fundamental rights do not override those interests.

The circumstances in which we will process your personal information are listed below.

- dealing with legal claims made against us
- preventing fraud
- business planning and restructuring exercises
- insurance claims
- ensuring our administrative and IT systems are secure and robust against unauthorised access

There may be more than one reason to validate the reason for processing your personal information.

LAWFUL BASIS FOR PROCESSING "SPECIAL CATEGORIES" OF SENSITIVE DATA

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- consent: You have given clear consent for us to process your personal data for a

- specific purpose.
- contract: The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
 - legal obligation: The processing is necessary for us to comply with the law (not including contractual obligations) and meets the obligations under our data protection policy.
 - vital interests: the processing is necessary to protect someone's life.
 - public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law and meets the obligations under our data protection policy.
 - legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests
 - Occasionally, special categories of data may be processed where you are not capable of giving your consent, where you have already made the information public or in the course of legitimate business activities or legal obligations and in line with the appropriate safeguards.

Where appropriate, we may seek your written authorisation to process special categories of data. Upon such an occasion we will endeavor to provide full and clear reasons at that time in order for you to make an informed decision. In any situation where consent is sought, please be advised that you are under no contractual obligation to comply with a request. Should you decline to consent you will not suffer a detriment.

MARKETING

Occasionally we may choose to send you direct marketing in relation to our products/services via post and telephone, as long as these are inline with the preferences you have provided us with.

Direct marketing via email/SMS will only be conducted where:

- You have given specific consent to receive marketing in this manner.

Should you wish to opt out of receiving marketing material you can do so by contacting dataprotectionofficer@duffields.co.uk or by writing to our head office Saxlingham Thorpe Mill, Saxlingham, Norfolk, NR15 1TY.

RECRUITMENT

If you apply for a position at Duffields you will be issued with a separate Privacy Policy relating to recruitment and how we process your data in relation to job applications.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We do not anticipate that we will process information about criminal convictions.

AUTOMATED DECISION-MAKING

We anticipate that some of our decisions will occur without human involvement. This includes credit checks which will involve processing information you have provided us with.

SHARING DATA

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties. This includes, for example, Credit Controller for their management of you/your account, the Directors and the Customer Services & Transport Departments for administering of your order under your contract with ourselves.

It may be necessary for us to share your personal data with a third party or third party service provider (including, but not limited to, contractors, agents or other associated/group companies) within, or outside of, the European Union (EU). Data sharing may arise due to a legal obligation, as part of the performance of a contract or in situations where there is another legitimate interest (including a legitimate interest of a third party) to do so.

The list below identifies which activities are carried out by third parties on our behalf:

- legal advisors
- security
- insurance providers

Data may be shared with 3rd parties in the following circumstances:

- in the process of regular reporting activities regarding our performance,
- with regards to a business or group reorganisation, sale or restructure,
- in relation to the maintenance support and/or hosting of data
- to adhere with a legal obligation
- in the process of obtaining advice and help in order to adhere with legal obligations

If data is shared, we expect third parties to adhere and comply with the GDPR and protect any data of yours that they process. We do not permit any third parties to process personal data for their own reasons. Where they process your data it is for a specific purpose according to our instructions.

We will not share your information for marketing purposes with any other companies.

We do not anticipate that we will transfer data to other countries.

DATA SECURITY

If you would like further details please contact dataprotectionofficer@duffields.co.uk. In addition, we have put further security measures in place to avoid data from being accessed, damaged, interfered with, lost, damaged, stolen or compromised. In cases of a breach, or suspected breach, of data security you will be informed, as will any appropriate regulator, in accordance with our legal obligations.

Any data that is shared with third parties is restricted to those who have a business need, in accordance with our guidance and in accordance with the duty of confidentiality.

DATA RETENTION

We anticipate that we will retain your data for no longer than is necessary for the purpose for which it was collected.

We have given consideration to the following in order to decide the appropriate retention period:

- quantity
- nature
- sensitivity
- risk of harm
- purpose for processing
- legal obligations

At the end of the retention period, upon conclusion of any contract we may have with you, or until we are no longer legally required to retain it, it will be reviewed and deleted, unless there is some special reason for keeping it. Occasionally, we may continue to use data without further notice to you. This will only be the case where any such data is anonymised and you cannot be identified as being associated with that data

YOUR RIGHTS IN RELATION TO YOUR DATA

We commit to ensure that any data we process is correct and up to date. It is your obligation to make us aware of any changes to your personal information.

In some situations, you may have the;

- **Right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- **Right to request access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request
- **Right to request correction.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- **Right to request erasure.** If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
- **Right to object to the inclusion of any information.** In situations where we are relying on a legitimate interest (or those of a third party) you have the right to object to the way we use your data where we are using it.
- **Right to request the restriction of processing.** You have the right to ask us to stop the processing of data of your personal information. We will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
- **Right to portability.** You may transfer the data that we hold on you for your own purposes.
- **Right to request the transfer.** You have the right to request the transfer of your personal information to another party.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent 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 dataprotectionofficer@duffields.co.uk

Consequences of your failure to provide personal information

If you neglect to provide certain information when requested, it may affect our ability to enter into or continue with a contract with you, and it may prevent us from complying with our legal obligations.

Change of purpose for processing data

We commit to only process your personal information for the purposes for which it was collected, except where we reasonably consider that the reason for processing changes to another reason and that reason is consistent with the original basis for processing. Should we need to process personal information for another reason, we will inform you of this and advise you of the lawful basis upon which we will process.

Important note: We may process your personal information without your knowledge or consent, in compliance with the above rules.

In the event that you enter into a contract with us, any information already collected may be processed further in accordance with our data protection policy, a copy of which will be provided to you.

QUESTIONS OR COMPLAINTS

Should you have any questions regarding this statement, please contact Tanya Warren on dataprotectionofficer@duffields.co.uk

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.