

## General Data Protection Regulation (GDPR)

### Privacy Notice

We issue this privacy notice in the interests of transparency over how we use (“**process**”) the personal data that we collect from our Customers, suppliers and third parties (“**you**”).

**Personal data** for these purposes means any information relating to an identified or identifiable person.

“**Sensitive personal data**” means personal data consisting of information as to -

- a) the racial or ethnic origin of the individual,
- b) their political opinions,
- c) their religious or philosophical beliefs,
- d) their membership of a trade union,
- e) their physical or mental health or condition,
- f) their sexual life,
- g) the commission or alleged commission by them of any offence,
- h) any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings,
- i) genetic data; and
- j) biometric data where processed to uniquely identify a person (for example a photo in an electronic passport)

### Data Controller

For data protection purposes the “**data controller**” means the person or organisation who determines the purposes for which and the manner in which any personal data are processed.

The data controller is Pyroprotect Ltd, Unit F1, Tom Bill Way Ashby De La Zouch, Leicestershire LE65 2UY

The Administrator for the data controller is Melanie Mee who can be contacted by email on [data@pyroprotect.co.uk](mailto:data@pyroprotect.co.uk) or telephone 01530 416870

### What personal data is collected?

We will collect, store and use the following categories of personal data about you:

- Personal contact details such as name, title.
- If provided personal email address and personal mobile phone numbers.
- CCTV footage and other information obtained through electronic means such as computerised records.

For you we do not collect, store and use sensitive personal data.

### **How data is collected from you.**

Your personal details are collected through direct communications “(Telephone, email)” with you or your company.

We do not collect data through targeting technologies “(Website)”. However if you email us through the website we may retain information from this email.

### **Purpose of processing the data**

It is necessary for us to process this personal data for the following reasons:

1. We will need the information in order to carry out Contracted works
2. We will need to maintain that information for the general purposes of the ongoing relationship including health and safety of our individuals on your premises.

Some examples of the specific situations in which we will use your personal data are: contact you regarding projects that you are carrying out, contact you to maintain the contract i.e. to inform you of start dates operatives details, health and safety paperwork and discuss the account. The purchasing of supplies.

Our legal basis for processing personal data of our customers, suppliers and third parties is that:

1. Processing the personal data is necessary for the purpose of carrying out the contract.
2. Processing is necessary to comply with a legal obligation (for example we are obliged under contract law to keep information for up to 21 years)
3. Processing the data is necessary for the purposes of our “**legitimate interests**” as the data controller (except where such interests are overridden by the interests, rights or freedoms of the individual).

Our “legitimate interests” for these purposes are:

1. the need to process data on customers, suppliers and third parties for the purposes of carrying out the contract;
2. the need to gather data on customers for the purposes safeguarding the health and safety of our individuals;
3. The need to process personal data for the purposes of entering into contract with the customer, supplier and third party.

### **Recipients of personal data**

Your personal data may be received by the following categories of people:

1. Our Sales team;
2. Contracts Manager;
3. Finance team;
4. Any individual authorised by us to maintain your files;
5. Our professional advisers; and
6. Appropriate external regulators and authorities (such as HSE)

A small amount of your personal data “(Name, Mobile number, signature)” maybe uploaded on to our online booking system and will be accessible by our operatives and you, where requested. This is for the purposes of contact details for our operatives and daily work records where requested.

We do not envisage that your data would be transferred to a country outside the EEA. If we perceive the need to do that we would discuss that with you and explain the legal basis for the transfer of the data at that stage.

### **Duration of storage of personal data**

We will keep personal data for no longer than is strictly necessary, having regard to the original purpose for which the data was processed. In some cases we will be legally obliged to keep your data for a set period.

Where data has been processed for sensitive enquiries i.e. MOD Projects and we are then informed that work has been awarded to another contractor the file is deleted within one month.

### **Your rights in relation to your personal data**

1. The right to be forgotten

You have the right to request that your personal data is deleted if:

- a) it is no longer necessary for us to store that data having regard to the purposes for which it was originally collected; or
- b) in circumstances where we rely solely on your consent to process the data (and have no other legal basis for processing the data), you withdraw your consent to the data being processed; or
- c) you object to the processing of the data for good reasons which are not overridden by another compelling reason for us to retain the data; or
- d) the data was unlawfully processed; or
- e) the data needs to be deleted to comply with a legal obligation.

However, we can refuse to comply with a request to delete your personal data where we process that data:

- a) to exercise the right of freedom of expression and information;

- b) to comply with a legal obligation or the performance of a public interest task or exercise of official authority;
- c) for public health purposes in the public interest;
- d) for archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- e) the exercise or defence of legal claims.

## 2. The right to data portability

You have the right to receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (us) where:

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

Note that this right only applies if the processing is carried out by “automated means” which means it will not apply to most paper based data.

## 3. The right to withdraw consent

Where we process your personal data in reliance on your consent to that processing, you have the right to withdraw that consent at any time. You may do this in writing to the Data Controller (Pyrotect Ltd).

## 4. The right to object to processing

Where we process your personal data for the performance of a legal task or in view of our legitimate interests you have the right to object on “grounds relating to your particular situation”. If you wish to object to the processing of your personal data you should do so in writing to Data Controller (Pyrotect Ltd) stating the reasons for your objection.

Where you exercise your right to object we must stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

## 5. The right of subject access

So that you are aware of the personal data we hold on you, you have the right to request access to that data. This is sometimes referred to as making a “subject access request”.

## 6. The right to rectification

If any of the personal data we hold on you is inaccurate or incomplete, you have the right to have any errors rectified.

Where we do not take action in response to a request for rectification you have the right to complain about that to the Information Commissioner's Office.

7. The right to restrict processing

In certain prescribed circumstances, such as where you have contested the accuracy of the personal data we hold on you, you have the right to block or suppress the further processing of your personal data.

8. Rights related to automated decision making and profiling

The GDPR defines "profiling" as any form of automated processing intended to evaluate certain personal aspects of an individual, in particular to analyse or predict:

- behaviour;
- location; or
- movement

You have the right not to be subject to a decision when it is based on automated processing; and it produces a legal effect or a similarly significant effect on you.

However, that right does not apply where the decision is necessary for purposes of the performance of a contract between you and us. We currently do not make automated decisions.

**Complaints**

Where you take the view that your, personal data is processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority in the UK is the ICO.

<b>Signed</b>	 Chris Goodison
<b>Job Title</b>	Managing Director
<b>Dated</b>	21.03.2022