



PRIVACY POLICY

1. Policy Statement

Every day our business will receive, use and store personal information about our customers and colleagues. It is important that this information is handled lawfully and appropriately in line with the requirements of the [Data Protection Act 2018] and the General Data Protection Regulation.

We take our data protection duties seriously, because we respect the trust that is being placed in us to use personal information appropriately and responsibly.

2. About This Policy and Who is Responsible

This policy, and any other documents referred to in it, sets out the basis on which we will process any personal data we collect and store.

This policy does not form part of any employee's contract of employment and may be amended at any time and will be available from our website (www.claygate.com). We do not knowingly collect data relating to children.

Claygate Digital Services are the controller and a processor (collectively referred to as 'we' 'us' or 'our' in this Privacy Policy) and are responsible for ensuring compliance with the Data Protection Requirements and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to us.

Our details are:

Claygate Digital Services Limited
Forest View, Long Reach, Ockham, Woking, Surrey, GU23 6PG
Registration Number: 1400515 England

You have a right to make a complaint at any time to the Information Commissioner's Office (ICO) (<https://ico.org.uk>).

3. What is Personal Data?

Personal data means data (whether stored electronically or paper based) relating to a living individual who can be identified directly or indirectly from that data (or from that data and other information in our possession).

Processing is any activity that involves use of personal data. It includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties (*as explained in section 5*)

Sensitive personal data includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including with the consent of the individual.

4. The Data We Collect About You

In the course of our business, we may collect and process the personal data set out in the *Schedule (15)*. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, payment and delivery services, credit reference agencies and others).

We will only process personal data for the specific purposes set out in the *Schedule (15)* or for any other purposes specifically permitted by the Data Protection Requirements.

We may collect, use, store and transfer different kinds of personal data about you, examples as follows:-

- a. Identity Data, includes first and last name.
- b. Contact Data, means the data we use to contact you including your billing, delivery, email address and telephone number.
- c. Financial Data, means data we use to process payments for your orders. We, (including the Factoring Company) do not store or process any card details.
- d. Automated Drawing Register (ADR) or any database of this nature, means data as above collected to complete daily requests for our Clients/Sub-contractors, as instructed by the individuals concerned, for this purpose only.

5. Third Party Data Sharing

In the course of our business, we may also share data with our Bank, Factoring Company, Accountants, Professional Advisers such as Lawyers and Insurers to manage risks and legal claims, etc and we may disclose information to Law Enforcement Agencies when we have good faith belief that disclosure is required by law or when we, in our discretion, believe that a disclosure is necessary to protect our legal rights or legal obligations.

Cloud Storage Providers – we use cloud computing platforms that securely store all of our data, including customer details.

Email Service Providers – In order to send you marketing content and correspondence emails , we share your details with our email service provider.

Social Media Platforms – We use LinkedIn, they will have their own privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with them to protect your privacy.

We will never sell, rent, loan or share your personal data with a third party for the purpose of marketing activity of any nature.

6. Data Protection Principles

We use technical measures such as password protection to protect your data. We also use operational measures to protect your data, for example limiting the number of people who have access, to those employees and third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Anyone processing personal data, must ensure that data is:

- a. Processed fairly, lawfully and in a transparent manner.
- b. Collected for specified, explicit and legitimate purposes and any further processing is completed for a compatible purpose.
- c. Adequate, relevant and limited to what is necessary for the intended purposes.
- d. Accurate, and where necessary, kept up to date.
- e. Kept in a form which permits identification for no longer than necessary for the intended purposes.
- f. Processed in line with the individual's rights and in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

7. Data Security

We will take all reasonable precautions against unlawful or unauthorised processing of personal data, and against the accidental or unlawful destruction, damage, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

We have in place procedures and technologies to maintain the security of all personal data from the point of the determination of the means for processing and point of data collection to the point of destruction.

We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

- a. **Confidentiality** means that only people who are authorised to use the data can access it.
- b. **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
- c. **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on our central computer system instead of individual PCs.

Security procedures include:

- a. **Entry controls.** Any stranger seen in entry-controlled areas should be reported.
- b. **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential).
- c. **Data minimisation.**
- d. **Pseudonymisation and encryption of data.**
- e. **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
- f. **Equipment.** Staff must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

8. Fair and Lawful Processing

The Data Protection Requirements are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the individual.

In accordance with the Data Protection Requirements, we will only process personal data where it is required for a lawful purpose. The lawful purposes include (amongst others): whether the individual has given their consent, the processing is necessary for performing a contract with the individual, for compliance with a legal obligation, or for the legitimate interest of the business.

- a. Other sources where personal data regarding the individual originated from and whether it came from publicly accessible sources.
- b. Whether the provision of the personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal data and any consequences of failure to provide the data.

9. Marketing

We may send out postal or email information regarding our business for the purpose of increasing awareness of our products and services, which is in our legitimate interests and in this scenario we will rely on you to let us know if you do not want to receive this by following the opt out instructions at the end of the email/postal literature, or by contacting us at any time.

10. Accurate Data

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us. We will check the accuracy of any personal data at the point of collection. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

11. Data Retention

We will not keep personal data longer than is necessary for the purpose or purposes for which it was collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. In some circumstances you can ask us to delete your data.

12. Your Legal Rights

Under certain circumstances you have rights under UK data protection laws in relation to your personal data:

- a. **Request access** to your personal data (data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b. **Request correction** of the personal data we hold about you (we may need to verify the accuracy of the new data you provide to us).
- c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it, for example, where you have withdrawn your consent to our using it and we have relied on that consent according to this policy, we have processed it unlawfully or where we are required to erase your personal data to comply with local law. However, we may not always be able to comply

with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- e. **Request restriction** of processing your personal data. This enables you to ask us to suspend the processing of your personal data: (1) if you want us to establish the data's accuracy, (2) where our use of the data is unlawful but you do not want us to erase it, (3) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims or (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate ground to use it.
- f. **Request the transfer** of your personal data to you or a third party. We will supply this in a commonly used, machine-readable format (this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you).

13. Subject Access Requests

When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:

- a. We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
- b. We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

Where a request is made electronically, data will be provided electronically where possible.

14. Claygate Digital Services' Cookies Policy

By visiting our Website or Automated Drawing Register (ADR) system with your browser settings adjusted to allow cookies, you are consenting to Claygate using cookies to enable some of the basic functionality that is required for you to browse/use the above.

For example:-

- a. **Session (Transient) Cookies**
These are stored in your computer's memory for the length of your browsing session. They become inaccessible after the session has been inactive for a time and are automatically deleted from your computer when the browser is closed. They allow you to move from page to page without having to log-in repeatedly.
- b. **Persistent (Permanent) Cookies**
These are stored in your computers' memory and are not deleted when the browser is closed. They are used to keep your preferences so they will be remembered for the next time you visit the website.
- c. **Flash (Locally Shared) Cookies**
Adobe Flash – Websites that contain Flash can also store small files on your computer that are used in the same way as cookies.

The information collected through these cookies is only used for this purpose and is never shared or sold on to third parties.

15. Changes to this Policy

We may need to update this Policy at any time and without notice. Where appropriate, we will notify changes by mail or email.

THE SCHEDULE DATA PROCESSING ACTIVITIES

Type of data	Type of data subject	Type of processing	Purpose of processing	Type of recipient to whom personal data is transferred	Retention period
EMPLOYEE	PERSONAL DATA	ADMINISTRATION	BUSINESS/SALARY/ ETC	ACCOUNTANTS BANK PENSION SUPPLIER HEALTHCARE SUPPLIER (PROFESSIONAL ADVISER)	DURING EMPLOYMENT AND THEREAFTER UNTIL NO LONGER REQUIRED
CUSTOMER	REGISTER NEW/UPDATE CUSTOMER DETAILS: NAME/ADDRESS/ EMAIL/TEL/BANK ACCOUNT DETAILS CHARGES	ADMINISTRATION INVOICING STATEMENTS GENERAL CORRESPONDENCE VIA MAIL OR EMAIL CLAYGATE CREDIT APPLICATION FORM	REGISTER NEW CUSTOMER/ UPDATE DETAILS: ACCOUNT/ADR/ DELIVERY/LABELS/ FACTORING	ACCOUNTANT FACTORING COMPANY (PROFESSIONAL ADVISER)	DURING CONTRACT/ USAGE AND THEREAFTER UNTIL NO LONGER REQUIRED BY LAW
SUPPLIER	NAME/ADDRESS/EMAIL/ TEL/BANK ACCOUNT DETAILS	ADMINISTRATION	BUSINESS / PAYMENT	NONE	DURING CONTRACT/ USAGE AND THEREAFTER UNTIL NO LONGER REQUIRED