

# John Aynsley

## (ARCHITECTURAL METALWORK) LIMITED

### PRIVACY POLICY

#### Introduction

At John Aynsley (Architectural Metalwork) Ltd we take your right to privacy seriously and want you to feel comfortable when using our services. Should we ask you to provide certain information by which you can be identified you can be assured that it will only be used in accordance with this Privacy Policy and only for the reasons you are aware of.

#### About this Privacy Policy:

- References to **we**, **us** or **our** means John Aynsley (Architectural Metalwork) Ltd.
- References to **you** or **your** means the person accessing and using our services (and or website) or the person who otherwise provides their personal information to us or about whom we otherwise collect personal information as explained in this Privacy Policy.
- Personal information is information that is about you and which identifies you.
- We have a separate Privacy Notice which applies to the personal information that we collect about employees.
- Our website is not intended for children and we do not knowingly collect data relating to children.

Who is responsible for the personal information that we collect?

We are the data controller for the purpose of data protection law, in respect of your personal information collected or obtained as outlined with this Privacy Policy. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact our Data protection Officer.

#### What personal information do we hold about you?

We may collect and process the following categories of information about you for different reasons, depending on why you are in touch:

- We collect data for the following categories of person.
- Customers, website users, social media users, members of the public
- Job applicants
- Contractors, suppliers and others who we do business with
- Information we receive from other sources

How we will use personal information we hold about you

We will only use your personal information when there is a legal basis for us to do so. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you, for example in relation to job applicants, contractors and suppliers (**for the performance of a contract with you**).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**for our legitimate interests or for a third party's legitimate interests**).
- Where we need to comply with a legal or regulatory obligation (**to comply with our legal obligations**).
- Where you provide us with your express or explicit consent (**with your consent**).

Your personal information may be used by us, our employees, service providers, and disclosed to third parties for a number of different purposes which we have set out below. For each of these purposes, we have set out the legal basis we rely on to do so.

### **Failure to provide us with your personal information**

We may be required to obtain your personal information to comply with our legal obligations or for the performance of our contract with you or to fulfil a request you have made. If you do not provide the relevant personal information to us, we may not be able to enter into the contract with you or properly perform our obligations under it. We may also be unable to fulfil your request.

Where your failure to provide information breaches a legal obligation we may be required to report this to regulators or law enforcement bodies. We will generally notify of the consequences of failing to provide us with required information at the time.

### **Automated decision making**

We do not undertake any processing of your personal information by automated means in order to make decisions about you.

### **Who we may we disclose your personal information to**

We may share your personal information with:

- Our service providers  
Our business partners, suppliers, contractors and their sub-contractors for the performance of any contract we enter into with you or for the performance of any contract we enter into with them which relates to our business and under which they deliver works and services to us, including works and services which may involve processing personal information on our behalf such as IT service providers.
- Third parties involved in our business and contracts.
- Our banks, insurers, professional advisers and agents  
Including our banks, accountants, lawyers, insurers, brokers, agents, consultants and other professional advisers that assist us in carrying out our business activities and public functions.

- Governmental, regulatory and legal authorities and third parties involved in legal action Government departments, governmental agencies, regulatory organisations and justice agencies (including the courts, tribunals, police, security services, Her Majesty's Revenue and Customs, local authorities, the Information Commissioner, the Health and Safety Executive, **and other regulators and law enforcement bodies.**
- Prospective sellers or buyers of our business and assets

In the event that we sell or buy any part of our business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets.

- **Health professionals and emergency services**  
In the event of an emergency we may disclose personal information to health and medical professionals and emergency services where the health, safety or security of a person is at risk.

### **How we protect your personal information**

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, altered, used, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to access this only and who are subject to a duty of confidentiality. In the case of third party data processors, they will only process your personal information on our instructions and have their own legal obligations under data protection law to protect your personal information and keep it secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **How long we will keep your personal information for**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information we hold, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information (and whether we can achieve those purposes through other means), and the applicable legal requirements.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Your rights and choices in relation to your personal information**

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the information

below for a summary of your rights. You can exercise these rights by contacting the Data Protection Officer.

- Right of access to your personal information
- Right to rectify your personal information
- Right to erasure of your personal information
- Right to restrict the use of your personal information
- Right to data portability
- Right to object to the use of your personal information
- Right to withdraw consent
- Right to complain to the relevant data protection authority

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated of our timescales.