



Secker & Sons (Norwich) Ltd

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## **GDPR Privacy Statement**

The new General Data Protection Regulation (GDPR) came into force on the 25<sup>th</sup> May. This E.U. regulation covers data protection and privacy for all individuals within the European Union and the right of the individual to be informed about the collection and use of their personal data. Secker and Sons (Norwich) Limited are committed to ensuring that your privacy is protected. This Statement sets out how Secker and Sons (Norwich) Limited uses and protects any personal identifying data that you supply us with in the course of business. All data by which you can be personally identified will only be used in accordance with this statement.

### **What personal identifying data we may collect from individuals, B2B clients and others**

This data can include (*but is not limited to*), First name and surname, address, email address, date of birth (for employees only), telephone numbers, and bank details. We do not process any 'sensitive' personal data of individuals and no data is processed on individuals under the age of 16. We use email communications when contacting our current customers, under the legal basis of legitimate interest and in some cases, fulfilling contractual obligations. If in the future we purchase data to use for email marketing communications, we will publish where we bought this data from. We will also confirm GDPR Compliance with any email provider we use, prior to employing their services and provide an opportunity for recipients to be removed from our mailing list.

When you make a telephone call to us, we do not record this conversation. If we need to process your enquiry, we will gather only the relevant information to do so. This may be passed to internal departments and or 3<sup>rd</sup> party contractors as required.

### **The lawful basis for the processing**

We have "Legitimate Interest" as the lawful basis in collecting and processing of data.

We will normally collect personal information from you only where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

### **The purpose of the data processing and collection**

We need to collect (non-sensitive) personal data about the people we employ, and those we have or intend to have a business relationship with, to effectively and compliantly carry out our everyday business functions and activities to provide the products and services defined by our business type.

With a structured and compliant data and records management system with records being defined as all documents, regardless of the format; which facilitate business activities, and are thereafter retained to provide evidence of transactions and functions and for legal legislative, statutory and regulatory requirements. Such records may be created, received or maintained in hard copy or in an electronic format.

We do not conduct any data profiling or collect any data in an automated way. We do not transfer data outside the UK or the European Union.

### **Who it will be shared with**

Directors, Administrative Staff and Engineers to conduct the necessary work and administration required for the business transaction. We often work with third party service providers, such as service contractors and delivery operators. To fulfil with some customer enquiries and orders, we have to share information with these third parties but they are only provided with the information required to complete the enquiry. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. We will never share your data with anyone who does not need access without your written consent. Adherence to this privacy policy by employees is mandatory and non-compliance could lead to disciplinary action.

### **How any personal identifying data is stored:**

Electronically ("in the cloud"). This provider has given us their assurances that they are fully compliant with the General Data Protection Regulations. Access to this data is password protected.

On our office computers/server. These are password-protected, backed up regularly on a secure server, and the offices are locked and alarmed out of working hours. On paper, in locked filing cabinets, and the offices are locked and alarmed out of working hours.

From time to time, we may have to employ Sub Contractors to perform work, which might give them access to your personal data. We will ensure that they are fully aware that they must treat the information as confidential and securely store your data.

### **The retention periods for the personal data**

Personal data, including paper records, is kept for as long as required to process customer and supplier contacts and contracts, anything thereafter that is no longer required is securely destroyed in a secure, confidential and compliant manner. Employee shredding machines are made available and where we use a service provider for large disposals, collections take place with GDPR compliant companies to ensure that confidential data is disposed of appropriately.

Unless otherwise stated in this policy or the retention periods register, correspondence and internal memoranda are only retained for the same period as the document to which they pertain or support (*i.e. where a memo pertains to a contract or personal file, the relevant retention period and filing should be observed*).

For correspondence or memoranda that do not pertain to any documents having already be assigned a retention period, these are deleted or shredded once the purpose and usefulness of the content ceases or at a maximum, 2 years. *Examples of correspondence and routine memoranda include (but are not limited to):* - Internal emails, meeting notes and agendas, general inquiries and replies.

We have a legal obligation to retain copies of Business Invoices for 7 years, but after this period they are destroyed in a secure manner.

Secker and Sons (Norwich) Limited uses numerous systems, computers and technology equipment in the running of our business. From time to time, such assets must be disposed of and due to the information held on these whilst they are active, this disposal is handled in an ethical and secure manner. The deletion of electronic records is organised in conjunction with our IT consultant, who ensures the removal of all data from the medium, so that it cannot be reconstructed.

### **Erasure**

In specific circumstances, data subjects' have the right to request that their personal data is erased, however the Company recognise that this is not an absolute '*right to be forgotten*'. Data subjects only have a right to have personal data erased and to prevent processing if one of the *below conditions applies*: -

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing

The personal data was unlawfully processed

- The personal data must be erased in order to comply with a legal obligation

Where one of the above conditions applies and Secker and Sons (Norwich) Limited has received a request to erase data, we first ensure that no other legal obligation or legitimate interest applies. If we are confident

that the data subject has the right to have their data erased, this is carried out in conjunction with any department manager and the IT team to ensure that all data relating to that individual has been erased. These measures enable us to comply with a data subject's right to erasure, whereby an individual can request the deletion or removal of personal data where there is no compelling reason for its continued processing. Whilst our standard procedures already remove data that is no longer necessary, we still follow a dedicated process for erasure requests to ensure that all rights are complied with and that no data has been retained for longer than is needed.

You have the following data protection rights:

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided

If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Disclosure of personal information

We may share your personal information with the following categories of recipients:

Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

### **Responsibilities**

Heads of departments and information asset owners have overall responsibility for the management of records and data generated by their departments' activities, namely to ensure that the records created, received and controlled within the purview of their department, and the systems (*electronic or otherwise*) and procedures they adopt, are managed in a way which meets the aims of this policy.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using [accounts@seckers.com](mailto:accounts@seckers.com)

This privacy notice does not provide exhaustive detail of all aspects of Secker and Sons (Norwich) Limited collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to Secker and Sons (Norwich) Limited, 7 St John's Close, Hall Road, Norwich NR1 2PR