

## **PRIVACY NOTICE: CLIENTS & SUPPLY CHAIN**

### **1. Overview**

Speedclad Ltd (“we” or “us”) is committed to data protection and data privacy. With the General Data Protection Regulations (GDPR) having come into force on 25<sup>th</sup> May 2018, we have undertaken a GDPR readiness programme to review our entire business, the way we handle data and the way in which we use it to provide our services and manage business operations.

We have issued separate Privacy Notices for our Employees and Subcontract Workers and for our Recruitment Processes; these are published through our Human Resources Management System. This notice details information relating to personal data held in relation to our Clients and Supply Chain.

We process personal data relating to our clients and supply chain members on the legal basis of Legitimate Interest and to meet contractual obligations. This notice details the personal data we may retain, process and share with third parties relating to your work with the business and vital business operations. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented secure physical, electronic and managerial procedures to safeguard and secure the personal data we hold.

### **2. Introduction**

We have issued this notice to describe how we handle personal information that we hold about our clients and supply chain members, including suppliers of both products and services, (collectively referred to as “you”).

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

If you are in any doubt regarding this notice, please contact Speedclad’s Business Services Director.

### **3. Types of personal data we collect**

The types of personal information we may process about you include, but are not limited to:

- Contact details – such as contact name, business address, email, telephone number.
- Financial details – such as business bank accounts and direct debit details.
- Employment details – such as job titles/ positions.
- Background details – such as academic/ professional qualifications, CVs.
- Prequalification questionnaire data about your company.

### **4. Purposes for processing personal data**

- To carry out our obligations arising from any agreements entered between you and us and to provide you with the information, products and services that you request from us.
- To communicate with you about prospective or live construction projects in which you and we have a legitimate interest.

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- To provide you with information about other goods and services we offer that are like those that you have already purchased or provided, enquired about or we feel may be of interest to you.
- To notify you about changes to our services.
- To communicate with you to gain feedback on our products or services in order to improve them.
- To meet our obligations under third-party accreditations and pre-qualification processes.

### 5. Who we share your personal data with

We may share your personal data with selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any agreement that we enter with them or you.
- Insurance companies for the purposes of a claim or potential claim on Speedclad's insurance.
- Accreditation bodies, such as BM Trada, Achilles, Constructionline, as part of the evidence provided during external assessments of our management systems.

#### 5.1 Transfer of personal data abroad

We may need to transfer personal data to countries outside the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal data outside the European Economic Area (EEA), such as to the United States, we will implement an appropriate data export solution such as entering into contract with the data importer that contain EU model clauses or taking other measures to provide an adequate level of data protection.

### 6. Data retention

Personal data will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this notice or as otherwise required by law. We will retain relevant personal data collected as part of construction projects for a minimum of 8 years from practical completion, or as superseded by the retention period dictated within the construction contract and any related warranties. Personal data related to our supply chain members will be retained for the duration of our relationship with those members, and for a minimum 3 years following the end of any such relationship.

### 7. Your rights

You may exercise the rights available to you under data protection law. These rights include:

- **The Right of Subject Access** – this is the right to access data we hold about you and, where required, an explanation of that data.
- **The Right to Rectification** – this is the right to have inaccurate or incomplete data rectified.
- **The Right to Request Erasure** – this is also known as the 'right to be forgotten' and means that, in certain circumstances, you have the right to ask us to delete data we hold on you.
- **The Right to Restrict Processing** – this is where you can request that we restrict/ block processing of personal data (but still retain it).

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- **The Right to Data Portability** – this allows people to reuse their personal data by requesting it in a usable format.
- Rights in relation to automated decision making and profiling.

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

To exercise any of these rights, please contact Speedclad's Business Services Director.

### **8. Issues and complaints**

We try to meet the highest standards when collecting and using personal information. For this reason we take any complaints that we receive very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would welcome any suggestions for improving our procedures.

This notice is drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you believe that there has been a Data Breach within our organisation you should report this in the first instance to our Business Services Director, who will investigate and will report the matter to the Information Commissioner's Office (ICO) if necessary.

If you want to make a complaint about the way we have processed your personal information, you can contact the ICO in their capacity as the statutory body that oversees data protection law.

### **9. Updates to this notice**

This notice may be updated periodically to reflect any necessary changes in our privacy practice. We encourage you to check this notice periodically to be aware of the most recent version.

### **10. Contact details**

Please address any questions or requests relating to this notice to the Business Services Director, Speedclad Ltd, Thurston House, Thornfield Business Park, Standard Way, Northallerton, DL6 2XQ, 01609 768970, [privacy@speedclad.co.uk](mailto:privacy@speedclad.co.uk)