



## **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS**

### **Introduction**

Environmental Building Solutions (EBS) Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

Environmental Building Solutions (EBS) Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Unit B2 The Point Business Park, Weaver Road, Lincoln LN6 3RW For all data matters contact Simon Castledine on 01522 686964.

### **3. The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

- Communicating with you regarding the work of the company (i.e. your email address and other contact details)
- Keeping records of orders placed/received and monies owing to or by both parties

#### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data: name, email address, contact details, job title, job responsibilities

We have obtained your personal data from yourself or a colleague who has forwarded it to us for the above purposes.

#### 5. What is our legal basis for processing your personal data?

##### Our lawful basis for processing your general personal data (article 6 of GDPR):

Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	COMMUNICATING WITH STAFF EMPLOYED BY BUSINESSES WE WORK WITH IS VITAL TO THE FULFILLMENT OF CONTRACTUAL OBLIGATIONS FOR THE WORK UNDERTAKEN BY EBS. WITHOUT THIS COMMUNICATION, WE WOULD BE UNABLE TO UNDERTAKE OUR DUTIES AS OUTLINED IN THESE CONTRACTS.
Processing necessary for compliance with a legal obligation	WE TAKE OUR LEGAL OBLIGATIONS TO MAKE PAYMENT, ADHERE TO HEALTH AND SAFETY LEGISLATION AND COMPLETE OUR WORK IN LINE WITH RELEVANT LEGISLATION SERIOUSLY. YOUR PERSONAL DATA MAY BE NECESSARY FOR THIS, IN TERMS OF OUR RELATIONSHIP WITH YOU AND OUR SHARED BUSINESS INTERESTS.
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	EBS HAS A LEGITIMATE INTEREST IN MAKING SURE THAT WE CAN CARRY OUT THE DUTIES FOR WHICH WE ARE RESPONSIBLE. THIS WILL INEVITABLY INVOLVE THE COLLECTION OF SOME PERSONAL DATA, AS OUTLINED ABOVE, SPECIFICALLY FOR THE PURPOSE OF COMMUNICATION ABOUT BUSINESS INTERESTS.

#### 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only internally and only with members of staff who have the need to know these details (i.e. project engineers, Accounts, etc.)

#### 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data:

Purpose of Information	Criteria to Determine Retention
Communicating with you regarding the work of the company (i.e. your email address and other contact details)	The length of time we keep these details will be based on the retention period required for the project to which they relate. The details will be deleted at the same time as the project as a whole is deleted. In general, this is a minimum

	of six years after project completion, though this may vary depending on project scope.
Keeping records of orders placed/received and monies owing to or by both parties	The length of time we keep these details will be based on the retention period required for the transaction(s) to which they relate. Financial information is generally kept for six years after the end of the financial year in which they took place, though there may be exceptions to this.
Business cards, providing the opportunity to contact and work together	Business cards, which include contact details, that have been obtained in the course of doing business or potential business, will be retained on the company database until such time as they are either no longer relevant or you request that we remove them. These details will not be used for marketing purposes, only for legitimate business or potential business purposes.

## 8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract and perform the duties thereof.

## 9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable, i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable, i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## 10. Transfer of Data Abroad

Any personal data we hold is saved onto the company database, which is cloud-based. This means that it may, at times, be processed by a company outside of the European Economic Area (EEA).

EBS undertakes due diligence on all companies we use for data processing and only use those that have stringent security policies and procedures in place to ensure the safety and integrity of all data they hold. We regularly audit the information they hold and process in order to ensure it's integrity.

## 11. Automated Decision Making

We do not use any form of automated decision making in our business.

## 12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### **13. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **14. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our Director on 01522 686964.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.