

ISSUE 1 – 27.3.18



ELLIEM LTD DATA PRIVACY POLICY

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1 About this policy

- 1.1 This policy explains when and why we collect personal information about our client and supplier base. It explains how we use it and how we keep it secure, and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as detailed when we collect data from you.
- 1.3 We reserve the right to amend this policy from time to time without prior notice. You are advised to check our website (www.elliem.co.uk) regularly for any amendments.
- 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of GDPR we will be the ‘controller’ of all personal data we hold about you.
- 1.5 All enquiries about this policy are to be directed to the Managing Director via jennie@elliem.co.uk.

2 Who are we?

- 2.1 We are Elliem Ltd. We can be contacted via jennie@elliem.co.uk or 01904 705126.

3 What information we collect and why

Type of information	Purposes	Legal basis for processing
Client name, address, telephone number and email address	Delivering our work for the client’s business and enabling us to contact the client in pursuance of that work.	Performing our legal contract with the potential or actual client.
	Invoicing for work done including requirement for payment of VAT	Legal obligation
Supplier name, address, telephone number and email address and bank details	Delivering our work enabling us to source products and services in pursuance of that work.	Performing our legal contract with the potential or actual supplier.
	Payment for goods and services received including requirement for payment of VAT	Legal obligation
Associate’s name, address, email address, phone number and relevant qualifications and/or experience and bank details	Managing the delivery of contracted work	Performing our legal contract with the potential or actual Associate.
	Payment for goods and services received including requirement for payment of VAT	Legal obligation

Data provided by 3 rd party	Managing the delivery	Performing our legal contract
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certification bodies to enable our staff to undertake audits and client based activities on their behalf	of contracted work	with the certification body
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4 How we protect your personal data

- 4.1 We will not transfer your personal data outside of the EU without your consent
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorized alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- 4.3 3rd parties are asked to note that where they are transmitting information to the business over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online, or make to you online, we will use a recognized online secure payment system.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- 4.6 Our IT systems are password protected and our offices are secured with alarms.

5 Who else has access to the information you provide to us?

- 5.1 We will never sell your personal data. We will not share your personal data with any 3rd parties without your prior consent (which you are free to withhold) except where to do so by law or as set out in the table above or paragraph 5.2 below.
- 5.2 We may pass your personal data to 3rd parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf. However we only disclose the personal data which is necessary for the 3rd party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6 How long do we keep your information?

- 6.1 We will hold your personal data on our systems for as long as you are a client of ours and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so we will stop processing your personal data except that we will retain it in an archived form to be able to comply with future legal obligations and the establishment exercise or defence of claims.
- 6.2 We securely destroy all financial information once we have used it and no longer need it.
- 6.3 For 3rd party certification work we will retain your data until we are advised that the work undertaken has been authorized or accepted by the Certification Body and that they have taken over custody of the information within their own data system. Their data privacy policy controls those activities.

7 Your rights

- 7.1 You have rights under the GDPR:
 - 7.1.1 To access your data
 - 7.1.2 To be provided with information about how your personal data is processed
 - 7.1.3 To have your personal data corrected
 - 7.1.4 To have your personal data erased in certain circumstances
 - 7.1.5 To object to or restrict how your personal data is processed
 - 7.1.6 To have your personal data transferred to yourself or to another business in certain circumstances

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- 7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner <https://ico.org.uk/concerns/>, 0303 123 1113, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

For more details please address any questions, comments and requests to us via the contact details provided earlier in the document.