

MAY 24, 2018

WESTLETON DRAKE PRIVACY NOTICE

POLICIES AND PROCEDURES FOR GDPR COMPLIANCE



BACKGROUND:

Westleton Drake understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all those who deal with us and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About us

Westleton Drake is registered in England operating from offices at 85 Gracechurch Street London EC3V 0AA.

2. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

- (a) Under the GDPR, you have the following rights, which we will always work to uphold:
- (b) The right to be informed about collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- (c) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- (d) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.

- (e) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 10 to find out more.
- (f) The right to restrict (i.e. prevent) the processing of your personal data.
- (g) The right to object to us using your personal data for a particular purpose or purposes.
- (h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- (i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- (j) For more information about use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do We Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

Name;

Date of birth;

Gender;

Address;

Email address;

Telephone number;

Business name;

Job title;

Profession;

Payment information;

National Insurance Number;

Unique Tax Payer Reference Number;

Social Security Number.

6. How Do We Use Your Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for performance of a contract with you, because you have consented to use of your personal data, or because it is in legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account or business relationship.
- Supplying services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post where we have a legitimate interest (you may unsubscribe or opt-out at any time by emailing our GDPR Controller or selecting to opt out on one of our emails).
- With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, post or telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.
- Verifying your identity.
- Recruitment purposes.

7. How Long Will We Keep Your Personal Data?

We will not keep your personal data for any longer than is necessary to fulfil the purpose for which it was first collected.

For instance, your contact details may be kept for as long as we feel that there is a mutual legitimate interest.

Payroll information shall be kept for six years and we typically keep CV's notes and cover letters for six months.

Tax records shall be kept in accordance with the requirements of our business and the services provided and any statutory or legal obligations.

8. How and Where Do We Store or Transfer or Share Your Personal Data?

Your data is stored on our secure servers here in the UK.

We only share personal data with others when we are legally permitted to do so. When we do share data, we have in place contractual arrangements and have put in place security measures to protect your data in compliance with the GDPR and our own high standards of confidentiality and security.

When processing your personal data, we may need to share it with others as follows;

- Other members of our group.
- Third party organisations that provide us with services such as application, functionality, IT Services and data processing.
- Law enforcement or other government and regulatory agencies – or to third parties as the law may require.
- Third parties who assist us in providing services or information.
- Third parties that assist us with our marketing activities.
- Auditors, lawyers and other professional advisors.

Transfers outside the EEA

If you are based within the EEA, please note that where necessary to deliver the services we may transfer personal information to countries outside the EEA. When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

9. How Can You Access Your Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover administrative costs in responding.

We will respond to your subject access request within one month of satisfactorily confirming your identity. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of progress.

10. How Do You Contact Us?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of the GDPR Owner.

- Email address: governance@westletondrake.com

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change business in a way that affects personal data protection.