

EAS UK ASBESTOS LIMITED



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Data Protection Policy

relating to
EAS UK Asbestos Limited

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Introduction

Welcome to the EAS UK Asbestos Ltd privacy policy.

We respect your privacy and are committed to protecting your personal data in accordance with applicable Data Protection Legislation. This privacy policy will inform you as to how we look after your personal data when you use our services and tell you about your privacy rights and how the law protects you.

1. Important information

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data (including any data you may provide through electronic means).

It is important that you read this privacy policy together with any applicable standard terms and conditions governing the provision of services to you. Please note that this privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

For the purposes of Data Protection Legislation, EAS UK Asbestos Ltd is the controller and responsible for your personal data (collectively referred to as "the Company", "we", "us" or "our" in this privacy policy) unless stipulated otherwise.

We have appointed a [data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact Mr Craig Livesey using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our [DPO **OR** data privacy manager] in the following ways:

Company Name::EAS UK Asbestos Ltd

Email address:office@easukasbestos.co.uk

Postal address:2 Hall Cottages The Hall London Road Six Mile Bottom Newmarket Suffolk CB08UF

Telephone number: **01638283871 or 012239202150**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 2nd January 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- ξ **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- ξ **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- ξ **Financial Data** includes bank account details.
- ξ **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, through our website or otherwise. This includes personal data you provide when you

- ξ apply for our products or services;
- ξ subscribe to our service or publications;
- ξ request marketing to be sent to you;
- ξ enter a competition, promotion or survey; or
- ξ give us feedback or contact us.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ξ Where we need to perform the contract we are about to enter into or have entered into with you.
- ξ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ξ Where we need to comply with a legal obligation.

Purposes for which we will use your personal data

Information in the form of name, address and contact telephone number(s) is a current statutory requirement for the completion of the enforcing authority notification (where applicable) and the compiling of the necessary Health & Safety documentation.

Our client's name, address, contact telephone number(s) and email address may also appear on documentation which is associated to the work being undertaken on a client's behalf, e.g. Waste Consignment Notes, Survey Reports, Laboratory Analysis Reports, Laboratory Airborne Monitoring and Clearance Reports.

Suppliers/Sub-contractors' information in the form of contact details, current insurance, accreditation certificates, Health and Safety Documentation etc. will only be used in connection with the services provided. Unless instructed otherwise, suppliers/sub-contractors' contact details may only be passed onto a third party for their business benefit only.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Data security

Personal data obtained by us will be retained in secure electronic format and hard copies will be held in secure locked office.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements and in any event, for not less than 8 years. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

7. Your legal rights

Under certain circumstances, you have rights under Data Protection Legislation in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- ξ If you want us to establish the data's accuracy.
- ξ Where our use of the data is unlawful but you do not want us to erase it.
- ξ Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- ξ You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. Glossary

LAWFUL BASIS

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Data Protection Legislation: all applicable data protection and privacy legislation in force from time to time in the UK including the General Data Protection Regulation ((EU) 2016/679); The Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended and any other European Union legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of Personal Data (including, without limitation, the privacy of electronic communications); and the guidance and codes of practice issued by the relevant data protection or supervisory authority and applicable to a party.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Personal Data: any information identifying a living individual or information relating to a living individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This includes special categories of personal data such as health data and pseudonymised personal data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.