

This **Privacy Notice** sets out the steps we follow when personal data is collected, **such as our identity and how we intend to use the information, the lawful basis for processing the data, our data retention periods and that individuals have a right to complain to the ICO** if they think there is a problem with the way we are handling their data.

### **Who we are.**

NA Curtain Walling Ltd, 21 Highcroft Industrial Estate, Enterprise Road, Horndean, Waterlooville, Hants PO8 0BT

What information we collect and hold that constitutes personal data

The majority of the information we collect and hold that can be classed as 'personal data' is name, address and other contact details such as email address and telephone number of our existing customers, suppliers and other stakeholders, to enable us to provide design, manufacture, installation and maintenance of curtain wall and cladding systems. Additionally, we will hold the information required for collection and payment of invoices.

We also collect and hold information on staff and contractors necessary to manage and support our team.

For new prospects we use names, addresses and other details such as email addresses and telephone numbers, to contact individuals to gain consent to use their data for marketing purposes in order to generate new business. We only hold this information once we have obtained consent to retain their data and explained the purposes of doing so.

### **How is it collected and by whom?**

Personal data is collected when we are asked to provide a quotation for a project or job, answer enquiries on our services, or to engage the services of a supplier or contractor. This will be done by a member of our team, for example, an estimator, contracts manager, buyer etc. New prospect data may be collected in a number of ways such as from a prospect company's web site, tender documents, meetings at exhibitions or business networking events.

Staff and contractor data is collected from the individual directly upon application to the company, then on an ongoing basis for the purposes of their employment or work allocation.

We use Google Analytics and Cookies on our web site to record quantitative data such as visitor numbers, pages viewed etc. but we do not track individuals online e.g., using Lead Forensics, or use inferred information through algorithms, or profile people by analysing data derived from combining other data sets.

### **What we do with the personal data we process?**

We are only collecting information we need and are going to use. We use the 'personal data' generally for carrying out our business as building envelope specialists providing design, manufacture, installation and maintenance of curtain wall and cladding systems.

For example, to provide a quotation, answer enquiries, provide competency information and generally communicate information relating to the company and our business.

We do not use your information for a particular purpose other than to carry out our business and communicate with you where appropriate, nor do we collect personal data by observation or draw inference from any individual's behaviour. We will not share any data with third-parties for marketing purposes.

We may, however, use the data provided by an existing customer to provide a quotation, to send them information on a related product or service that we think may be beneficial to them. This would only be done in a reasonable way, and in a manner that they would expect.

### How long we keep personal data?

We have specific retention times for each category of data which are set out in our Information Asset Register.

### Who will your data be shared with?

Data will only be shared with external third parties when there is a specific business need, for example we might share data if we were to outsource an aspect of work, employee data will be shared with the pension provider and we are likely to share team competency information with main contractors or clients.

To cover this sharing of data, we have agreements in place with all the suppliers that may come into contact with any of the personal data we hold, to ensure the supplier is compliant with GDPR, and recognise their responsibilities when processing our data.

All reasonable steps are being taken to ensure data security both organisationally and technologically. As part of our data security measures, staff can only access our computer systems through password protected systems. We utilise brand-named back up solutions, which in turn means we are 'sharing' data with back up providers. They use strict security policies, strong industry-standard encryption, and world-class data centers to ensure information we share with them is protected. We utilize internal and external support to ensure data security, for example by keeping our virus protection software and firewall protection current, utilising encryption tools, and utilising IT security options available to us.

### What will be the effect of this on the individuals concerned?

There should be no impact on the individual as a result of our processing. We aim to always be fair, transparent and ensure that people know how their information will be used. Data security is a key consideration and we do everything we can to protect the data hold.

This applies whether the personal data was obtained directly from the data subjects or from other sources.

### Is the intended use likely to cause individuals to object or complain?

Our use of data will not have any unjustified adverse effects on individuals. We are only using information in a way which they would expect. There are no adverse consequences of not providing information to us - for example, non-receipt of a benefit.

### The Lawful Bases of our data processing.

The lawful bases for our data processing activity are **Legitimate Interest & Contract** for activities relating to staff, suppliers, existing customers and other stakeholders, and **Consent** for marketing communications purposes to new prospects.

In general terms, purpose of processing information is to enable us to provide, to support and manage our employees, promote and advertise our products and services, and maintain our own accounts and records.

- **Legitimate Interest** is appropriate to most of our processing activity, in order to conduct our business as outlined above. We have balanced our commercial interests against the individual's interests, rights and freedoms. Our processing has a minimal privacy impact.
- **Contract:** the processing is necessary for a contract we have with an organisation, or we haven't yet got a contract with an organisation, but they have asked us to do something as a first step (eg provide a quote) and we need to process personal data to do what they ask.
- **Consent** is the most appropriate legal basis for the processing of new prospect information. We would obtain consent in order to provide communications relevant to commercial requirements. We will always make it clear when requesting Consent what the data will be used for and have clear, simple ways for people to withdraw consent. We will not transfer personal data outside the EU without the individual's consent.

We will explain our lawful basis for processing personal data when we answer a 'subject access request'.

### **Who the Data Controller / DPO is.**

Although we are not required to formally designate a Data Protection Officer (DPO), we have a nominated person to take responsibility for data protection compliance, this will be the Group Accountant.

Individuals have the right to request access to the data we hold on them by submitting a request to do so addressed to our DPO, who will provide details on any information retained by us as outlined in our **Data Protection Policy**.

### **Data Protection by Design and Data Protection Impact Assessments**

We aim to adopt a privacy by design approach and will carry out a Privacy Impact Assessment (PIA), also referred to as 'Data Protection Impact Assessments' (DPIA), as part of our GDPR compliance system in situations where data processing is likely to result in high risk to individuals, for example:

- where a new technology is being deployed;
- where a profiling operation is likely to significantly affect individuals; or
- where there is processing on a large scale of the special categories of data.

If a DPIA indicates that the data processing is high risk, and we cannot sufficiently address those risks, we will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

### **The Right to Complain**

**Contact** If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to [info@nacurtainwalling.com](mailto:info@nacurtainwalling.com) or by post to:

DPO, NA Curtain Walling Ltd, 21 Highcroft Industrial Estate, Enterprise Road, Horndean, Waterlooville, Hants PO8 0BT

### **Data Controller**

The Data Controller is NA Curtain Walling Ltd, 21 Highcroft Industrial Estate, Enterprise Road, Horndean, Waterlooville, Hants PO8 0BT, and we are registered with the ICO - registration reference ZA220490.

We always seek to treat an individual's data fairly, however, individuals have the right to complain to our Data Protection Officer, who will investigate and respond accordingly within one month. Complaints should be sent addressed to:

The Data Protection Officer, NA Curtain Walling Ltd, 21 Highcroft Industrial Estate, Enterprise Road, Horndean, Waterlooville, Hants PO8 0BT

Should the response not be resolved to the satisfaction of the complainant, the individual can also take up their issue with the Information Commissioner's Office (the ICO) at the following address:

The Information Commissioner's Office,  
Wycliffe House, Water Ln, Wilmslow SK9 5AF