

General Data Protection Regulation (GDPR) Policy

Original prepared on: 01 May 2018
Reviewed on: 14 July 2020 **To be reviewed on:** 1 January 2021
Prepared by: Ralph Elliott-King - Financial Controller

Reviewed and accepted on behalf of Marisco South Ltd (the Company) by:



Samuel Clover - Director

On: 14 July 2020

This policy supersedes and replaces any previous policy documents on data protection and applies to Marisco South Ltd and Marisco Electrical Ltd (Marisco Group). Marisco South Ltd is the data controller and processor for both companies and is registered with the Information Commissioner's Office (ICO) under reference ZA255673.

BACKGROUND:

Marisco Group understands that privacy of personal information is important. There are moral and legal reasons why care must be exercised in how personal data is retained and used. We respect and value the privacy of our employees, clients and suppliers and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and the rights of individuals under the law.

1. Information About Us:

Marisco South Limited (Company Reg No: 07612484)

Marisco Electricals Limited (Company Reg No: 10113519)

Registered Office and trading address:

Unit J5, The Fulcrum, 6 Vantage Way,
Poole, Dorset, BH12 4NU.

Data Protection Officer: Ralph Elliott-King

Email address: accounts@mariscosouth.co.uk

Telephone number: 01202 474001

2. What does this policy cover?

This privacy policy explains how we use individual's personal data, how it is collected, how it is held, and how it is processed. It also explains individual's rights under the law relating to how their personal data is used.

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 an individual that enables them to be identified. Personal data covers obvious information such as individual's 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 Section 5.

4. What rights does an individual have over the way we hold or use their personal data?

Under the GDPR, individuals have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of individual's personal data. This Privacy Notice should tell an individual everything they need to know, but they can always contact us to find out more or to ask any questions using the details in Part 11.
- The right to access the personal data we hold about an individual. Part 10 explains how to request this access.
- The right to have an individual's personal data rectified if any of that personal data held by us is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any individual's personal data that we have.
- The right to restrict (i.e. prevent) the processing of an individual's personal data.
- The right to object to us using an individual's personal data for a particular purpose or purposes.
- The right to data portability. This means that, if an individual has provided personal data to us directly, we are using it with individual's consent or for the performance of a contract, and that data is processed using automated means, the individual can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of an individual's personal data or exercising individual's rights as outlined above, please contact us using the details provided at the end of this policy.

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

If an individual has any cause for complaint about our use of their personal data, they 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 the individual's relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Bank account name, sort code, and account number where we arrange payments to individuals such as employees or suppliers.

6. How do we use the personal data we collect?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with an individual, because they have consented to our use of their personal data, or because it is in our legitimate business interests to use it. An individual's personal data may be used for one of the following purposes:

- Providing and managing individual's account.
- Supplying our services to the individual concerned. Individual's personal details are required in order for us to enter into a legal contract with that person.
- Communicating with an individual. This may include responding to emails or calls from that person.
- Supplying an individual with information by email and post that they have opted-in to (individuals may unsubscribe or opt-out at any time by emailing us at opt-out@mariscosouth.co.uk).

With an individual's permission and/or where permitted by law, we may also use individual's personal data for marketing purposes, which may include contacting these people by email, post or telephone with information, news, and offers of our services.

Individuals will not be sent any unlawful marketing or spam. We will always work to fully protect individual's rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and individuals have the opportunity to opt-out any time by emailing opt-out@mariscosouth.co.uk.

We do not use any automated or manual systems for carrying out decision-making profiling.

7. How long do we keep personal data?

We will not keep an individual's personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Individual's personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- To satisfy the HMRC's requirement for us to retain VAT transactional records we may keep the personal details of our clients and suppliers for up to seven years after the end of our last relevant accounting period date.
- For insurance claim purposes we are obliged to keep certain details of individual employment histories until we have been informed by our insurers such records are no longer required.

8. How and where do we store or transfer personal data?

We will only store or transfer hard copies of an individual's personal data in the UK. This means that it will be fully protected under the GDPR rules.

When we store an individual's personal data in hard copy or electronic format, we take a number of important measures to protect its security, which includes:

- All staff members who will have access to such information will be trained on the requirements of GDPR;
- Only authorised staff members may access personal data;
- Any hard copy documents containing personal data are stored in secured offices with restricted access;
- All hard copy documents containing personal data are shredded and disposed of in a responsible way; and
- All electronic personal data is stored on secure, password protected devices with access restricted to only GDPR trained and authorised staff.

9. Do you share personal data?

We will not share any part of an individual's personal data with any third parties for any purposes, subject to two important exceptions.

1. The individual has given their written permission to share information to a third party; or
2. In some limited circumstances, we may be legally required to share certain personal data, which might include an individual's personal data if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any part of an individual's personal data is required by a third party, as described above, we will take steps to ensure that persons personal data is handled safely, securely, and in accordance with the individual's rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

10. How can an individual access the personal data we may hold on them?

If someone wishes to know what personal data we may hold about them, they 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 Section 11.

To make this as easy as possible for you, we can supply a *Subject Access Request Form*. Individuals do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to requests as quickly as possible.

There is not normally any charge for a subject access request. If an individual's request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover the administrative costs in responding.

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

11. How to contact us?

To contact us about anything to do with individual's personal data and data protection, including to make a subject access request, please use the following details:

GDPR Department, Marisco South Ltd
Unit J5, The Fulcrum, 6 Vantage Way,
Poole, Dorset, BH12 4NU

Tel: 01202 474001

Email: accounts@mariscosouth.com

12. 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 our business in a way that affects personal data protection.

Any changes will be made available by re-issuing this Policy to reflect the change in circumstances.