

GDPR Policy

1. About this policy

- 1.1 This policy is based around the EU Data Protection Rules and explains when and why we collect personal information about our employees, customers and suppliers and how we use it and how we keep it secure and anyone's rights relating to it.
- 1.2 We may collect, use and store personal data, as described in this Data Processing Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website www.toengineering.co.uk or our company handbook for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data and no information will be shared without the express permission of the individual or company. Further details on the GDPR can be found on the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

2. Who are we?

- 2.1 We are Turnell and Odell Ltd., Precision Engineers, Sanders Rd., Wellingborough. NN8 4NL and we can be contacted as above by phone – 01933-222061 – or by email – sales@toengineering.co.uk

3. What information we collect and why

Type of information	Purposes	Legal basis of processing
<u>Employees</u>		
Name – Address – contact details – N.I. number. Personal references.	Managing the Employee’s situation - pay membership of the Club. Managing the duty roster.	Ensuring employees are correctly remunerated for services provided.
The names of the Employees’ relatives and emergency contact details	Contacting the next of kin in the event of emergency.	Protecting the Employees interests and those of their dependents.
Date of birth/age related information.	Managing employment rights	Ensuring correct practices are followed.
Photos of employees	Putting on the Company’s website and social media pages and using in any advertising material.	Consent. We will seek the Employee’s consent on joining the company and any employee may withdraw their consent at any time by contacting us by e-mail or letter.
<u>Customers</u>		
Names of Customers – nature of business – contact details – phone numbers – email addresses - Job descriptions	Collected for working relationship with Customer and will not be distributed without consent	For the purposes of our legitimate interests in working with the customer.
<u>Suppliers</u>		
Names of Supplier – services provided – contact details – phone numbers – email addresses - Job descriptions	Collected for working relationship with Supplier and will not be distributed without consent	For the purposes of our legitimate interests in working with the supplier.

4. How to protect personal data

- 4.1 We will not transfer your personal data without your consent.
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, 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 Please note however that where we are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments that are made online we will use a recognised 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.

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

- 5.1 We will never sell or distribute your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required 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 third parties who are service provider, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not 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 an Employee of Turnell and Odell 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 your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defense of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the GDPR:

(a) to access your personal data

(b) to be provided with information about how your personal data is processed

(c) to have your personal data corrected

(d) to have your personal data erased in certain circumstances

(e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances.

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, Cheshire.

SK9 5AF

Further Contact

Should you have any issues with this policy or require more details, please address any questions, comments and requests regarding our data processing practices to the Managing Director via the company address.



Kevin Rees
Managing Director

October 2020