

Privacy Policy

Inter City Environmental Consultants Limited takes your privacy very seriously and we respect your privacy and data protection rights.

This privacy notice aims to give you information on how we collect and process your personal data through our legitimate interests, including any data you may provide through our website

Legitimate interests is the necessary processing for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

Please take time to read this privacy notice in full, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, to ensure that you understand and are happy with how we collect and process your personal data.

This privacy notice supplements the other notices and is not intended to override them.

We sometimes collect and process Sensitive Data (See section 5 of this Privacy Policy for details). Except where set out to the contrary in another of our Privacy Notices, we do not collect or process any information about criminal convictions and offences.

1. Controller

This privacy notice is issued by Inter City Environmental Consultants Limited (Company number: 7377026 with its registered office at 43b Plains Road, Mapperley, Nottingham, NG3 5JU) who is the Controller and is responsible for our website and services

2. Contact Details

Our contact details are:

Inter City Environmental Consultants Limited, t/a ICE Asbestos, 3a Cardwell Street, Radford, Nottingham, NG7 6FW

info@iceasbestos.com

You have a right to make a complaint at any time to the Information Commissioner's Office (ICO), the supervisory authority for data protection issues in the UK (phone: 0303 1231133 or at www.ico.org.uk/concerns). However, we would appreciate the chance to deal with your concerns first before you approach the ICO, so please feel free to contact us in the first instance



3. Changes to this Privacy Notice and changes to your details

We will need to update this privacy notice from time to time as the law and/or our business changes and develops. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please look out for updates on our website. If you continue to use our website and/or services after we have changed our privacy policy, we will take this as an indication that you accept the changes.

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

4. Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website that you visit.

5. Personal data we process

Personal data 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 process different kinds of personal data about you, which we have categorised as follows:

- **Identity data:** Including your name, username (or similar identification numbers that we may apply to you), email address, title, date of birth and gender
- **Contact data:** including your address, email address and telephone number(s)
- **Financial data:** including your bank details for making payments to employees and suppliers
- **Transaction data:** including the details of the services purchased
- **Technical data:** including information we collect through your use of our website (see our third-party-data section on our website www.iceasbestos.com/third-party-data for details)
- **Profile data:** including purchases, feedback, survey responses
- **Usage data:** including information about how you use our website
- **Marketing and Communications:** including your preferences in receiving marketing from us and your communication preferences
- **Sensitive data:** including information about your health (employees)

5. How we collect your personal data

We use different methods to collect personal data from and about you including through:

- **Direct interactions:** you may give us your identity, contact, financial (employees & suppliers), marketing and communications data by filling in forms or by corresponding with us by post, email, social media or otherwise. This includes personal data you provide when you purchase our services, request our information, complete a survey or give us feedback
- **Social media interactions:** our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media contact (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and also your technical, profile and marketing and communications data
- **Automated technologies:** as you interact with our website and our services, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies
- **Other third parties or publicly available sources:** we may receive personal data about you from various third parties and public sources as set out below:
 - Technical data from analytics providers such as Google, advertising networks search information providers
 - Marketing and communications data and technical data from online advertising data providers such as Google based outside the EEA
 - Identity data, contact data, transaction data, technical data, profile data and marketing and communications data from third party affiliate sites
 - Profile data and marketing communications data from social media providers based inside and outside the EEA
 - Identity and contact data from publicly available sources such as Companies House

6. How we process your personal data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent and please note that you have the right to withdraw your consent at any time by contacting us
- Where we need to perform a contract we are about to enter into, or have entered into, with you
- 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
- Where we need to comply with a legal or regulatory obligation

6. How we process your personal data (continued)

The details below set out how we process your personal data. Please contact us if you would like further information about the basis for processing

Activity - To process and deliver a service that you have ordered from us

- **Personal data:** - Identity data, Contact data, Financial data, Transaction data
- **Basis for processing** – Performance of a contract with you, Necessary for our legitimate interests (being able to recover debts due to us)

Activity – To process your registration with us

- **Personal data:** Identity data, Contact data, Profile data
- **Basis for processing** – Performance of a contract with you

Activity – To tailor our direct marketing to you and send you marketing communications

- **Personal data:** Identity data, Contact data, Technical data, Transaction data, Usage data, Profile data, Marketing and communication data
- **Basis for processing** – In terms of tailoring our direct marketing, necessary for our legitimate interests, being to develop our business and inform our marketing strategy. In terms of sending direct marketing where you are a customer and have not previously opted out of receiving such direct marketing, as necessary for our legitimate interests, being able to offer you relevant services related to what we have previously provided to you. In terms of sending direct marketing where you are not one of our customers, with your consent through our website or otherwise give your details and provide consent when doing so

Activity – To manage our relationship with you

- **Personal data** – Identity data, Contact data, Profile data, Marketing and communications data, Sensitive data (only as required for dealing with feedback and complaints about specific issues)
- **Basis for processing** – Performance of a contract with you, necessary to comply with a legal obligation, necessary for our legitimate interests (to keep our records updated and to study how customers use our services)

Activity – To administer and protect our business and website and offer safe and secure use of our services

- **Personal data** – Identity data, Contact data, Technical data, Usage data, Profile data, Marketing and communications data
- **Basis for processing** – Performance of a contract with you, necessary for our legitimate interests, being able to run our business, ensure network security and prevent potential criminal behaviour, necessary to comply with a legal obligation

6. How we process your personal data (continued)

Activity – To provide information to legal and regulatory bodies where we are under a legal or regulatory obligation to do so

- **Personal data** – Identity data, Contact data, Technical data, Transaction data, Usage data, Profile data, Marketing and communications data
- **Basis for processing** – Necessary to comply with a legal obligation

7. How we share your personal data

We cannot run our business or provide many of the services you expect without involving other people and businesses. We only share your information in accordance with the laws applicable to us

We share your personal data with: IT, HR, system administration services, service providers, professional advisors, the Police, the Health and Safety Executive, HMRC, the Courts and any other central or local government bodies where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it

We may also share this information with other third parties where we are legally obliged to do so; for example, to comply with a court order

8. How we keep your personal data secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers, to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also 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

9. Our retention of your personal data

We can only keep your personal data for as long as necessary for the purposes we collected it for, including for the purpose of satisfying and legal, accounting, or reporting requirements

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining 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 requirements

We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary.

10. Your rights

In certain circumstances, you may have the right to request, access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object and/or restrict our processing of your personal data. Details of the rights are set out below

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or 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. Please 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
- **Rectification:** you may request rectification 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
- **Erasure:** you may request erasure of the personal data that we hold about you. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue 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, 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:** you may object to how we are processing 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 over-ride your rights and freedoms

10. Your rights (continued)

- **Restriction:** you may request that we restrict how we process your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Withdrawal of consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. 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 services to you. We will advise you if this is the case at the time you withdraw your consent

To exercise any of these rights please contact us using the details in paragraph 2

The ICO regulates most UK data and information laws. To learn more about your rights, visit the ICO website at www.ico.org.uk

Signed:



Print: Anthony Easy

Date: 20.05.2018