

GDPR Privacy Notice for Clients & Customers

1. PURPOSE OF THIS NOTICE

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time in the UK ('Data Protection Legislation').

2. ABOUT US

Corporate Facilities Services Limited provides cleaning and security services in addition to the provision of maintenance, landscaping services consumable supplies. We are registered in England and Wales as a limited company under number 346 5315 and our registered office is at Chart House, 2 Effingham Road, Reigate, Surrey RH2 7JN.

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about your company, for example, when you request a quotation or proposal from us in respect of the services we provide; when you engage us to provide our services and also during the provision of those services; when you contact us by email or telephone from third parties and/or publicly available resources.

4. THE KIND OF INFORMATION WE HOLD AND WHY WE NEED IT

We collect basic data about your company, which does not include any sensitive personal information (known as Special Category Data). The information we hold about your company may include your company name and/or address, email address, telephone numbers: details of contact we have had with you in relation to the provision, or the proposed provision, of our services; details of any services you have received from us; our correspondence and communications with you; information about any complaints and enquiries you make to us and other information, which you or third parties provide to us.

5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your company data for purposes necessary for the performance of our contract with you and to comply with our legal obligations. This may include processing your personal data where you are our client, or an employee, subcontractor, supplier or customer of our client.

We may process your company data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests rights and freedoms, which require the protection of personal data, for example business development, statistical and management purposes. Other legitimate business purposes for which your data may be processed include improvement in our services and communications and the enhancement of our IT security as and when necessary.



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We may process your company data for additional purposes with your consent and in these limited circumstances where your consent is required, you have the right to withdraw your consent to processing for such purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you and us (which will most usually be for the provision of our services);
- Carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- Provide you with information and updates related to our services, and notify you about any changes to our services.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your company data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

Data retention

We will only retain your company data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your company data, we take into consideration the requirements of our business and the services provided: any statutory or legal obligations; the purposes for which we originally collected the data; the lawful grounds on which we based our processing: the types of data we have collected; the amount and categories of your data; and whether the purpose of the processing could reasonably be fulfilled by other means.

We systematically review our retained information and destroy/delete it when no longer required.

Change of purpose

Where we need to use your company data for another reason, other than the purpose for which we collected it, we will only use this data where that reason is compatible with the original purpose.

Should it be necessary to use your company data for a new purpose, we will notify you and communicate the legal basis that allows us to do so before starting any new processing.



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6. DATA SHARING

Why might you share my company data with third parties?

We will share your company data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Which third-party service providers process my company data?

Third-party service providers carry out the following activities:

• Email, IT and Cloud services (including accountancy software providers)

All our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your company data. We only permit our third-party service providers to process your company data for specified purposes in accordance with our instructions.

What about other third parties?

We may share your company data with other third parties, for example in the context of the possible sales or restructuring of the business. We may also need to share your company data with a regulator or otherwise comply with the law.

7. TRANSFERRING DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We will not transfer the data we collect about your company to countries outside of the EEA unless it is to a country for which there is an adequacy decision by the European Commission. In this case, the country will be deemed to provide an adequate level of protection for your personal information for the purpose of the Data Protection Legislation.

8. DATA SECURITY

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

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

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9. RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- 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 exercised your
 right to object to processing (see below).
- 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 that makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the
 processing is based on consent, carried out by automated means and this is technically
 feasible.

If you want to exercise any of the above rights, please email our data protection point of contact using the email address *info@corpfs.co.uk*

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.



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10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us). You have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact using the email address <code>info@corpfs.co.uk</code>.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be notified to you by email.

This privacy notice was last updated 25 May 2018.

12. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email <u>info@corpfs.co.uk</u> or telephone 02380 465625.

You also have the right to make a complaint to the Information Commissioner's Office (ICO) the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone 0303 123 1113 (local rate) or 01625 545 745

Website – ico.org.uk/concerns