



Dolphin Midlands Ltd Customer Privacy Notice

❖ Policy No: 018

❖ Date: Jan 22

• Review date- Jan 23

This Privacy Notice explains what information is collected about you, why it is needed, how it is used, how it is stored, how long it is kept and what measures are in place to keep personal information secure.

Dolphin Lifts Midlands Ltd, furthermore known throughout this policy as 'The Company', is aware of its obligations under the General Data Protection Regulation (GDPR) and UK data protection legislation and is committed to processing your personal data securely and transparently, in manual and electronic form.

Definitions

Personal information means any information relating to an identified or identifiable person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity.

Processing Personal Information means any operation which is performed on personal data, whether manually or via electronic means, such as collecting, processing, recording, organising, storing, altering, consulting, using, deleting or destroying.

Data Controller refers to the Company's role in determining the processes to be used when using your personal data.

Data Processors refer to the roles given to specific employees and specific organisations to process personal data as directed by the Company.

Data Protection Principles

The Company believes its collection, use and storage of personal data is consistent with its employment and business relationships, as well as meeting GDPR's six data protection principles:

1. Personal data must be processed lawfully, fairly and in a transparent manner in relation to an individual
2. Personal data can only be collected for specified, explicit and legitimate purposes
3. Personal data must be adequate, relevant and limited to what is necessary for processing
4. Personal data must be accurate and, where necessary, kept up-to-date
5. Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing
6. Personal data must be processed in a manner that ensures its appropriate security



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In addition, personal data will be processed in recognition of an individual's data protection rights ie their right to be informed, right of access, right for inaccuracies to be corrected, right to have information deleted, right to restrict the processing of data, right to portability, right to object to inclusion of any information and right to regulate any automated decision-making and profiling of personal data.

Responsibilities

The Directors have overall and ultimate responsibility for ensuring the Company meets its obligations regarding the processing of your personal data as a data controller.

The Company ensures:

- Personal information will be processed fairly and in accordance with applicable laws.
- Employees will be informed directly, via information in this Privacy Notice and in the Employee Handbook about how it will use personal information.
- Most personal information will only be collected and processed when it is required for a contractual reason, legitimate purpose or legal reason.
- Personal information will be relevant, adequate and not excessive for the purpose for which it is processed.
- Personal information will not be kept for longer than it is required.
- Personal information will be kept secure and access will be limited to only those that need it.
- Specific data protection responsibilities will be clearly explained to data processors and appropriate information and training will be given when required
- Customers will be told how they can access personal information and exercise their rights in relation to it

Types of Data Held

Different types of personal information may be required, depending on your particular circumstances and role, as well as the Company's legitimate business interests and legal or contractual requirements. The following are the typical types of personal information that the Company might collect and process. Please note they are for illustrative purposes and are non-exhaustive:

- Individual and Contact Information: Name, Address, Email Address, Phone Number
- Pay Information: Bank account details, Purchase History
- Personal details used in the process of RIDDOR reporting and accident investigation
- Any data send to us in any form by a customer without prior knowledge of the content



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Reasons for Processing Personal Information

We will use your name and contact details to carry out agreed services and progress payment of those services. For any follow-on contact after the completion of any agreed contracted services, such as for on-going marketing purposes, separate consent will be sought.

The Company recognises the importance of seeking individuals' consent for obtaining, recording, using, sharing, storing and retaining their personal data, and regularly reviews its procedures for doing so, including appropriate audit trails. The Company understands that consent must be freely given, specific, informed and unambiguous. The Company will seek consent where appropriate. Full information will be given regarding the activities about which consent is sought. Relevant individuals have the absolute and unimpeded right to withdraw that consent at any time.

The Company will only rarely request personal information on the basis of your individual consent. Reasons are likely to be limited to organisational marketing or communication purposes, such as through the use of photographs, video or individual profiles for publicity. You will be required to give your specific consent to be involved and your right to withdraw consent and have any such personal data removed will also be clearly explained.

Data Disclosures

The personal data you provide will be held securely in both manual and electronic form. Your personal data will be shared with employees within the Company where it is necessary for them to carry out their data processing duties. We will not share any of the information you provide with any third parties for marketing purposes

Security of Personal Information

The Company routinely checks its organisational and technical security measures to guard against the unauthorised access, improper use, alteration, destruction or accidental loss of personal information. Personal information stored in electronic form is on password protected Company IT hardware and appropriate cloud storage and paper copies are kept in separate lockable filing cabinets. The company protects all servers and computers containing electronic personal data through the use of approved security software and firewalls and carries out a sequence of regular back-ups and system updates. If the Company needs to disclose personal information to other authorities to meet legitimate and legal obligations, it will ensure only relevant and accurate information is sent using secure channels. The Company will carry out privacy breach risk assessments on a regular basis and use its findings to improve and strengthen the Company's processes and systems.



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Safe Deletion or Destruction of Personal Information

The Company ensures that your personal information is only kept for reasonable periods of time to meet its legitimate business, contractual and legal obligations. Once we have stopped providing services to you, your personal data will be kept for a period of four years past the end of contract, which is kept live on the company database, and paper copies kept in locked storage cabinets. After 4 years, the data is then archived for 2 years and then destroyed. This procedure is in action in case we need to contact you with regard to any complaint or rectify any problems, unless other legal requirements are applicable. All accounting and financial information will be kept for the same time stated above. After that time manual and electronic copies will be safely shredded and deleted, respectively.

Accessing Personal Information

You have a legal right to make a request to the Company for disclosure of copies of personal information on you which is being processed by the Company: this is called a *Subject Access Request*. The Company seeks to process any such requests as quickly as possible, but within one month of the date of receipt. In some cases, the data will be exempt from the disclosure requirement, but if this applies, you will be informed. If you wish to make a Subject Access Request, you are required, in the first instance, to contact your manager, who will provide you with further details.

Contact Name and Address

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