

RAVENSBY GLASS COMPANY LIMITED

GDPR Privacy notice for its Customers and Suppliers.

April, 2018

What is the purpose of this document?

Ravensby Glass Co Ltd is committed to protecting the privacy and security of your information.

This privacy notice describes how we collect and use information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all Customers & Suppliers.

Ravensby Glass Co Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former Customers & Suppliers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Data, or information, means any information about a trader from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use some or all the following categories of personal information about you:

- [Contact details such as name, title, addresses, telephone numbers, and personal email addresses.]
- [Bank account details and tax status information.]
- [Compensation history.]

- [Performance information.]
- [CCTV footage and other information obtained through electronic means.]
- [Information about your use of our information and communications systems.]
- [Photographs.]

How is your information collected?

We collect information about Customers & Suppliers through routine commercial procedures. We may sometimes collect additional information from third parties including former customers, credit reference agencies or other background check agencies.

We will collect additional information in the course of contract related activities throughout the period of you trading with us.

How we will use information about you

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

- We may use information for any of the following purposes.
- [Education, training and development requirements.]
- [Dealing with legal disputes involving you including accidents at work.]
- [Complying with health and safety obligations.]
- [To prevent fraud.]
- [To monitor your use of our information and communication systems to ensure compliance with our IT policies.]
- [To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.]

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your information.

Change of purpose

We will only use your information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

[We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.]

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your information outside the EU.

If we do, you can expect a similar degree of protection in respect of your information.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group [as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data .

What about other third parties?

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

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from The Company Secretary. To determine the appropriate retention period for data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer or supplier of the company we will retain and securely destroy your information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with information

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

- **Request access** to your information (commonly known as a "data subject access request"). This enables you to receive a copy of the information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your information. This enables you to ask us to delete or remove information 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 information where you have exercised your right to object to processing (see below).

- **Object to processing** of your information 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. You also have the right to object where we are processing your information for direct marketing purposes.
- **Request the restriction of processing** of your information. This enables you to ask us to suspend the processing of information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your information to another party.

If you want to review, verify, correct or request erasure of your information, object to the processing of your data, or request that we transfer a copy of your information to another party, please contact The Company Secretary in writing.

No fee usually required

You will not have to pay a fee to access your information (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.

What we may need from you

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 information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact The Company Secretary. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your information.

If you have any questions about this privacy notice, please contact The Company Secretary, Ravensby Glass Co Ltd., 8 Tom Johnston Road, Dundee. (email: info@ravensbyglass.co.uk)