

Cammack and Wilcox Limited.  
Master Internal Privacy Policy.

POLICY-

This Privacy Policy provides information to personnel on how Cammack and Wilcox Limited (CW) collects and processes personal data through use of our website.

Our website is not aimed at children or any persons who are not old enough to own their own home, or any persons who are not at a legal minimum working age.

CW are legally authorised to gather, handle, record and retain certain data relating to customers, employees and other companies. The information shall be necessary and not in excess, it shall comply with confidentiality and data protection legislation as a minimum. It is important that this policy is read by personnel of whom it shall directly impact so they are fully aware of how and why CW use personal data.

AIMS- (As far as reasonably practicable, CW shall aim to)-

- > Comply with all data protection legislation, laws and requirements (as minimum).
- > Protect personal data and information.
- > Minimise the risk and likelihood of privacy and data protection breaches.
- > Provide data protection information to relevant personnel to whom it shall apply.

SCOPE-

For the purposes of this policy, CW is the 'controller' (also referred to as the company, company, we, us or our). The controller is responsible for collecting personal data.

CW shall update this policy and make necessary changes from time to time. It is the responsibility of you to check this page for such updates to ensure you are happy with them. This policy is effective as of 01<sup>st</sup> February 2023.

Personal data/information – any information about an individual from which that person can be identified. It does not include anonymous data (where information has been removed).

Cookies – small text files that are placed on your computer by websites that you visit (websites require them to work). They provide information to site owners re your visit.

Our website may include links to third-party sites, plug-ins and applications. It will store cookie files on your computer in order to deliver services. Clicking on these links or enabling such connections may allow third parties to collect, store or share data about you. CW do not control or have any control over such sites and situations, nor are we responsible for their privacy statements. When you leave our website, we encourage all personnel to read the privacy notice of every website you visit.

PROCEDURES-

There are various methods in which personal data is collected, including and through:

> Direct

Interactions: Providing identity and contact data by completing form(s) via email, phone, post or otherwise. Including applications for services and social media links.

CW may collect, use, store and transfer different kinds of personal data, as listed below.

- > Identity Data: First/Last name.
- > Contact Data: Company name, email address.

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- > Technical Data: Internet protocol (IP) address, login data, location, time zone settings, browser plug in type/version, operating system and platform, other technology on devices used to access website.
- > Profile Data: Username, password, interests, preferences, survey responses.
- > Usage Data: How personnel use our website, products and services.
- > Marketing Data: Communication and marketing preferences.
- > Communications Data: All communications we have with personnel (email, post or otherwise).
- > Aggregated Data: Statistical and demographic data. CW shall collect, use and share such data for any purpose. This is not classified as personal data by law as it does not directly or indirectly reveal identity.

Where personal data is required to be collected by law, or under contract terms, and personnel fail to provide, CW may not be able to complete the service in which we have entered into a contract, in such instances we may be forced to cancel agreed/booked service and personnel will incur an 'aborted fee' (in which you will be notified of-including costs. CW may process personal data for more than one lawful ground depending on the specific purpose for which we are using said data.

Personal data will only be used when the law allows CW to. Most commonly, personal data will only be used in the following circumstances:

- > Where we need to complete/perform the service/s in which we have entered into a contract to perform for you (e.g., location address in which service/s are to be completed).
- > Where it is necessary for our legitimate interests (or those of a third party) and the interests of personnel and fundamental rights do not override these interests.
- > Where CW need to comply with a legal or regulatory obligation.

In these circumstances, CW shall always request and confirm personnel's consent before personal data is shared with any company other than CW.

CW will only use personal data for the purposes in which we collected it for, unless we reasonable consider that we need to use it for a different reason, and, that reason is compatible with the original purpose. If we need to use personal data for an unrelated purpose, CW shall always notify personnel, explaining the legal basis in which it allows us to do so. Please note that CW may process personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

CW may share personal data with third parties (such as auditors). Third parties are required by law to respect the privacy and security of your personal data. We do not allow third party service providers to use your personal data for their own purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

CW shall never knowingly transfer your data outside of the UK or Europe.

Appropriate security measures have been implemented to prevent personal data from being accidentally lost, used or accessed, altered or disclosed in an unlawful manner. We limit the access to personal data from our employees. Personal data is treated as strictly private and confidential, it shall be password protected and stored on a separate, secured hardrive in which only Director, Health and Safety Lead and Payroll Admin have access to, even then, they do not have access to full personal data and only the relevant data in which they are

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required to ensure their job completion. Employees that do have access to personal data are only required to act as per the Director's instructions and are subject to confidentiality and privacy at all times. CW have put into place procedures to deal with any suspected personal data breach, in such instances, involved personnel shall be notified immediately by the Director. Confidential data will only be retained for as long as necessary to enable us to fulfil the purposes in which it was first collected for. When deciding the suitable retention period(s) for personal data, the nature and sensitivity of the personal data is considered, including the potential risk of harm from unauthorised use or disclosure.

Retention periods are outlined within our separate internal 'Retention Policy'-personal copies are available upon personal request from employees, copies will be issued electronically via email. Requests should be made via email to- [info@cammackandwilcox.co.uk](mailto:info@cammackandwilcox.co.uk)

In some circumstances, requests can be made to delete personal data, CW may also anonymise personal data (so it is no longer associated with you).

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Requests to access, correct, erase; restriction to process, transfer and withdrawal requests can be made via electronic email to- [info@cammackandwilcox.co.uk](mailto:info@cammackandwilcox.co.uk) Personnel will incur no fees in these instances, however, CW may charge a reasonable 'admin fee' if requests are clearly unfounded, repetitive or excessive in CW's professional opinion. Alternatively, we may refuse to comply with such requests in these circumstances.

CW may need to request specific information from personnel to help confirm identities and ensure your right to access personal data (or to exercise any of your other rights). This is a security measure to ensure personal data is not disclosed to unauthorised personnel.

CW will try to respond to all legitimate requests within one month. Occasionally, it may take us longer than this during busy business periods or if it is a complex request. In this case, you will be notified by CW and will be updated accordingly.

It is important that personal data is current, accurate and relevant, please update CW of changes to personal data in the first instance during your relationship with us.

Questions relating this policy should be sent via email to - [info@cammackandwilcox.co.uk](mailto:info@cammackandwilcox.co.uk) CW aim to respond (via email) to questions within 7 working days.

Complaints relating to this policy may be sent to the Information Commissioner's Office (ICO), this is the UK's supervisory authority for data protection issues. Their website is [www.ICO.org.uk](http://www.ICO.org.uk). We politely request that complaints are addressed to us first as we would appreciate the chance to deal with and rectify your concerns prior to you approaching the ICO. Please contact us in the first instance via email – [info@cammackandwilcox.co.uk](mailto:info@cammackandwilcox.co.uk) CW aim to respond to complaints within 5 working days. Please provide your preferred contact method within your email so we know how best to respond and contact you regarding the complaint.

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