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## **CLIENT AND SUPPLIER DATA PROTECTION AND PRIVACY POLICY**

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### **Section 1 – Data Protection**

#### **A) INTRODUCTION**

We may have to collect and use information about clients and suppliers with whom we work. This information must be handled and dealt with properly, however it is collected, recorded, and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of data information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat this information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of client and supplier data in manual and electronic records kept by us in connection with our Company operations function. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the data of individual clients and suppliers of Inspectahire Instrument Company Ltd. and former clients of Inspectahire Instrument Company Ltd., suppliers, and self-employed contractors. These are referred to in this policy as relevant individuals.

#### **B) DEFINITIONS**

“Data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Data processing” is any operation or set of operations which is performed on client data or on sets of client data, supplier data, whether by automated or manual means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

### **C) DATA PROTECTION PRINCIPLES**

Under GDPR, all data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful, and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant, and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of client data including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of client data

### **D) TYPES OF DATA HELD**

We keep several categories of data on our customers and suppliers in order to carry out effective and efficient processes. We keep this data within our computer systems, for example, CRM data base and Sage Accounts system

Specifically, we hold the following types of data:

- a) client details such as name, address, phone numbers, email addresses and correspondence
- b) supplier details such as name, address, phone numbers, email addresses and correspondence

All the above information is required for our processing activities. More information on those processing activities is included in our privacy notice for customers and suppliers, which is available from our website.

### **E) INDIVIDUAL RIGHTS**

You have the following rights in relation to the client data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on "Subject Access Requests".
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification'.
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure'.
- e) the right to restrict the processing of the data.
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information.

## **F) RESPONSIBILITIES**

To protect the data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.

## **G) LAWFUL BASES OF PROCESSING**

We acknowledge that processing may only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the customer/supplier consent to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed, and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Customers and Suppliers will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

## **H) ACCESS TO DATA**

As stated above, our customers and suppliers have a right to access the client data that we hold on them. To exercise this right, they should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive, or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request can be made by telephoning our office on 01732 851416.

## **I) DATA DISCLOSURES**

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

These kinds of disclosures will only be made when strictly necessary for the purpose.

## **J) DATA SECURITY**

Where data is computerised, it will be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

## **K) THIRD PARTY PROCESSING**

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures to maintain the Company's commitment to protecting data.

## **L) INTERNATIONAL DATA TRANSFERS**

The Company does not transfer data to any recipients outside of the EEA.

## **M) REQUIREMENT TO NOTIFY BREACHES**

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

## **N) TRAINING**

New employees who will have access to Company data must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data compliance officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

## **O) RECORDS**

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its Data Record. These records will be kept up to date so that they reflect current processing activities.

## **P) DATA PROTECTION COMPLIANCE**

Our appointed compliance officer in respect of our data protection activities is:

Lillian Paterson

[lillianpaterson@inspectahire.com](mailto:lillianpaterson@inspectahire.com)

Telephone: +44 (0) 1224 789692

## **Section 2 – Privacy**

### **A) INTRODUCTION**

Inspectahire Instrument Company Ltd. is committed to the highest standards of information security, privacy, and transparency. We place a high priority on protecting and managing data in accordance with accepted standards. We confirm our compliance with the relevant GDPR regulations, as a Data Controllers, while also working closely with our customers and clients to meet our obligations for our services.

This privacy notice sets out how Inspectahire Instrument Company Ltd. uses and protects any information that you give Inspectahire Instrument Company Ltd. in physical writing, electronic communication, verbally or when using the company website.

Inspectahire Instrument Company Ltd. reserves the right, at its discretion, to make changes to any part of the Website, the Information, or these Terms. Inspectahire Instrument Company Ltd. may change this policy from time to time by updating this document or corresponding page if viewed online. By continuing to engage the services of Inspectahire Instrument Company, provide services to or use the Website you agree to be bound by these Terms.

### **B) WHAT WE COLLECT**

When you engage the services of Inspectahire Instrument company Ltd. or use the “Contact Us” form on our website, you may have to provide basic information which identifies you as an individual (“Personal Information”), such as your name, email address and phone number in order to enable you to take advantage of particular services that we offer.

We will only use such Personal Information for the purposes of providing information which you have requested, or for other purposes set out in these Terms.

What we do with the information we gather.

We require this information to understand your needs and provide you with a better service, and for the following reasons:

- a) Internal record keeping.
- b) We may use the information to improve our products and services.
- c) Supply the requested services or products to our clients
- d) Engage the services of suppliers.

### **C) HOW WE USE COOKIES**

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### **D) THIRD PARTY COOKIES**

##### Cookie Name & Purpose

##### Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. To opt out of Google Analytics please go to the following link: <https://tools.google.com/dlpage/gaoptout>

##### Twitter

If you visit our News page (<https://twitter.com/Inspectahire/status/1214145862898724865>) twitter sets a cookie to remember where you viewed our twitter feed. To reject or delete these cookies: <http://twitter.com/privacy>. Twitter tags allow us to show relevant adverts on Twitter to users that have previously visited our website. To reject these cookies: <https://support.twitter.com/articles/20170405>

##### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **E) HOW WE PROCESS YOUR PERSONAL INFORMATION**

We collect and use your personal information in accordance with this privacy notice.

Inspectahire Instrument Company Ltd. is committed to the safe and appropriate processing, monitoring, and safeguarding of your data. We will not sell, distribute, or lease your personal information to third parties unless we have your explicit permission or are required by law to do so. Employees, associates, and agents of Inspectahire Instrument Company Ltd. may be given access to specific personal Information which we collect, but their use shall be limited solely to the performance of their duties.

## **F) THE LEGAL BASIS FOR US COLLECTING AND STORING DATA**

### Consent

By sending us your personal information, you are consenting to us collecting your information to send you offers or promotions which we believe may be of interest to you, or to supply your details as supplier or client referees. You have the right to withdraw consent at any time.

### Legitimate Interests

We may also process your data in connection with conducting and managing our business to ensure the security and integrity of our service to you or that of our clients. For example, we have an interest in making sure our marketing is fair reasonable and relevant as well as protecting customers, employees, and other individuals.


When we process your personal information for our legitimate interests, we make sure to consider and balance any impact on you (both positive and negative) and your rights under Data Protection legislation. However, our legitimate business interests do not override your interests and we will not use your information where it has a disproportionate effect on you.

You may request details of personal information which we hold about you. If you would like a copy of the information held on you, please write to Lillian Paterson, Data Protection Officer, Inspectahire Instrument Company Ltd., Badentoy Road, Badentoy Industrial Estate, Portlethen, Aberdeenshire, AB12 4AY.

If you are concerned that we have breached a privacy law or code binding on us, if you believe that any information, we are holding on you is incorrect or incomplete, or you want us to remove any information we hold on you, please send an email marked "Urgent" to Lillian Paterson, Data Protection Officer at [lillianpaterson@inspectahire.com](mailto:lillianpaterson@inspectahire.com). We aim to acknowledge your request within a reasonable time (normally five working days).

If you remain unhappy about how we have handled your personal information, please contact us direct in the first instance and will endeavour to resolve the problem directly with you. If you are not happy how the matter is dealt with, you have the right to take your complaint to the Information Commissioner's Office (ICO). For more information on contacting the ICO please see their website [www.ico.org.uk](http://www.ico.org.uk).

Authorised by:

  
Cailean Forrester (Sep 9, 2024 12:11 GMT+1)

Name: Cailean Forrester

Title: Managing Director

Date: 09/09/2024

(Review period is within 13 months from this date )








# Client and Supplier Data Protection and Privacy Policy 2024 -2025

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