 <b>BRITISH ENGINEERING SERVICES</b>	<b>BUSINESS MANAGEMENT SYSTEM</b>	<b>00-00-M03-12</b>
	<b>DATA PROTECTION PRIVACY NOTICE</b>	<b>Version No. 1 May 2018</b>

## 1. Introduction

British Engineering Services Limited uses personal data to provide our Testing, Inspection and Certification services. We will only process personal data in a manner that complies with the EU General Data Protection Regulations (Regulation (EU) 2016/679), commonly referred to as GDPR.

As defined by GDPR, personal data relates to a natural person ('Data Subject') who can be identified from that data. Identification can be directly achieved from the information alone, or indirectly from any other information in our possession (or likely to come into our possession) that can be used to identify an individual. Such information can include the Data Subject's name and contact details. It may also include information about how our websites and other applications are used.

## 2. Who is responsible for personal data?

British Engineering Services Limited is responsible for your data. Our registered office is 5 New York Street, Manchester, M1 4JB. We are registered as a company in England and Wales (Number: 09299724). We are the Data Controller of any personal data that we collect and process. Our Chief Risk Officer is accountable for establishing the framework to control the way personal data is collected, the purpose for which it is used and processed by us.

## 3. How we process personal data

As a Data Controller, British Engineering Services Limited is responsible for compliance with its obligations by ensuring that personal data is processed lawfully, protected from loss, misuse, unauthorised access or disclosure, excessive amounts of data is not collected or retained, they are kept up to date, stored and destroyed securely and by ensuring that appropriate security measures are in place to protect personal data, specifically:

- a) Processed lawfully, fairly and in a transparent manner in relation to Data Subjects
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and, where necessary, kept up to date
- e) Kept in a format which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed; and
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 4. How we collect personal data

Depending on how our services, websites or applications are used, personal data can be collected from our customers, suppliers, new business leads, employees or other third parties. Examples of how this personal data can be collected include, but is not limited to, the following:

- Job applications to join British Engineering Services Limited - recruitment, screening/vetting forms, identification documents
- Customer or supplier information as provided - terms and conditions of contracts, contact details
- Communication - letters, emails, telephone calls, messages through our on-line social media platforms

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- Computer records - usage of our website and other applications
- Offices - CCTV images are recorded at our locations; and
- Media - including photographic or other images.

#### **5. Purpose and legal basis for processing personal data**

We only process personal data if we have a valid and lawful reason for doing so. This is to enable us to carry out our business activities, market, promote and advertise our services, maintain our own accounts and records, support and manage our employees - past, present or future. Our legal basis for processing personal data will comply with at least one or more of the following conditions:


- a) Consent - the consent of the Data Subject is freely given, specific, informed and unambiguous by clear explicit means for one or more specific purposes
- b) Contract - processing essential to the performance of a contract or steps required to enter into a contract such as a contract of employment or contracts with customers or suppliers
- c) Legal Obligation - compliance with a legal obligation to which the Data Controller is subject to
- d) Vital Interests - when necessary, to protect the vital interests of a Data Subject or other natural person - such as an emergency or urgent situation
- e) Public Interest - when necessary in the public interest, or exercise of authority vested in the Data Controller. An example would be release of data to the Police or The Health and Safety Executive
- f) Legitimate Interests - pursued by the Data Controller, or other third party, for example corporate governance and legal compliance.

#### **6. Special categories of 'sensitive personal data'**

In addition to satisfying the legal basis for processing personal data above, processing of 'sensitive personal data' such as data revealing ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation will be prohibited unless one of the following conditions is met:


- The Data Subject has given explicit consent
- Processing is necessary for carrying out obligations under employment, social security, social protection law, or a collective agreement
- Processing is necessary to protect the vital interests of a Data Subject or other natural person where they are physically incapable of giving consent
- Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation or not-for-profit body
- Processing relates to personal data which is manifestly made public by the Data Subject
- Processing is necessary for the establishment, exercise or defence of legal claims, or where courts are acting in their judicial capacity
- Processing is necessary for reasons of substantial public interest
- Reasons of public interest, in the area of public health; and
- Processing is necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health/social care, or treatment/management of health.

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<b>7. Record of processing</b>
<p>Depending on how our services, websites or applications are used, personal data can be collected from our customers, suppliers, leads, employees or other third parties. Examples of how this personal data can be processed include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Provision of our services to customers including Testing, Inspection and Certification services</li> <li>• Marketing, sales and promotion of our services</li> <li>• Contact details of our customers and suppliers</li> <li>• Managing our Accounts</li> <li>• Managing our Personnel Records</li> <li>• Managing our staff, contractors or other third parties employed by British Engineering Services Limited; and</li> <li>• Use of CCTV systems to monitor and collect visual images for the purpose of security, crime prevention/detection and for the safety of our staff or the public</li> </ul>
<b>8. Sharing of personal data</b>
<p>We may be required to share personal data with, or obtain personal data from, third parties as a direct consequence of our business activities. Only necessary information is subsequently shared, for example, with:</p> <ul style="list-style-type: none"> <li>• Government authorities such as The Health and Safety Executive</li> <li>• Service partners, sub-contractors or suppliers who provide services to us</li> <li>• Clients and customers who restrict access to their sites for security and/or health and safety reasons</li> <li>• Training providers and Accreditation Bodies; and</li> <li>• Consultants.</li> </ul>
<b>9. How long we keep personal data</b>
<p>We keep a Data Subject's information for only as long as we need it. This will depend on what we are using the data for, whether that is to provide services to you, for our own legitimate interests and business requirements, or so that we can comply with legal requirements. We will actively review the information we hold and when there is no longer a legal or business requirement for us to retain such data, we will either delete it confidentially or, in some cases, anonymise it.</p>
<b>10. How we ensure the security of personal data</b>
<p>British Engineering Services Limited takes the security of its personal data very seriously. We have security protocols to ensure we handle data appropriately and protect it from accidental loss or misuse. We use technical measures such as secure servers and password protection to safeguard data and the systems they are held in. We only permit access to information where there is a business requirement to do so.</p>
<b>11. Automated decision making</b>
<p>British Engineering Services Limited does not process data solely by automated means.</p>
<b>12. Transfer of data abroad</b>
<p>British Engineering Services Limited does not transfer personal data outside of the European Economic Area (EEA).</p>
<b>13. Further processing</b>
<p>If British Engineering Services Limited wishes to process a Data Subject's personal data for a new purpose not covered by this Privacy Notice, then we shall provide you with a new Privacy Notice explaining this new purpose,</p>

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prior to commencing the processing and setting out the relevant purpose and processing conditions. Whenever necessary, we will seek your prior consent to the new processing.

#### 14. Data Subject rights

As a Data Subject, you have the right to:

- Request a copy of your personal data which British Engineering Services Limited holds about you
- Request that the Data Controller corrects any personal data that is found to be inaccurate or out of date
- Request your personal data is erased where it is no longer necessary to retain such data
- Withdraw our consent to processing at any time - if consent is relied upon as a processing condition
- Request that the Data Controller provide the Data Subject with their personal data and where possible to transmit that data directly to another Data Controller (data portability)
- Request that a restriction is placed on further processing where there is a dispute in relation to the accuracy or processing of your personal data
- Object to the processing of personal data - where processing is based on legitimate interests; and
- Lodge a complaint with The Information Commissioner's Office.

#### 15. Right to be informed

If your personal data is not obtained directly from you, British Engineering Services Limited will provide you with the following additional items of information within one month of having received your personal data:

- The categories of personal data we are processing; and
- The source from where the personal data originates and whether it came from publicly accessible sources.

#### 16. Key contacts

To exercise any of your rights, or if you have any complaints concerning the processing of your personal data, please email us at [data.protection@briteng.co.uk](mailto:data.protection@briteng.co.uk) or write to us at Data Protection, British Engineering Services Limited, 5 New York Street, Manchester, M1 4JB.

When you get in touch, we will respond as soon as possible and within one month. However, if your request is more complicated, it may take longer to respond. However, we will come back to you within two months of your request. There is no charge for most requests, but if you ask us to provide a significant amount of data, we may ask you to pay a reasonable administration fee. We will also ask you to verify your identity before we provide any information to you.

#### 17. The independent UK regulator for data privacy is the Information Commissioner's Office

Please note that you have the right to lodge a complaint with the supervisory authority which is responsible for the protection of personal data in the country where you live or work, or in which you think a breach of data protection laws might have taken place.

In the UK, please contact the Information Commissioner's Office by telephone on: 0303 123 1113 or via their website: [www.ico.org.uk](http://www.ico.org.uk).

#### Version Control/History

Date	Version No.	Description
May 2018	1	New Policy
May 2018	1a	Minor typographical amendments

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