

Data Protection and Privacy Policy

1 General

1.1 Alfred Bagnall & Sons Ltd., also known as Bagnalls, together with any group companies (“we” “us” “our”) are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2 Visitors to our website

2.1 We may collect and process personal data about you in the following circumstances:

2.1.1 when you complete forms on our website (“Site”). This includes name and contact details you may provide when you ask us to contact you about our services or apply to work for us;

2.1.2 whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;

2.1.3 Details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see section 2.2.2 on Cookies below); and

2.1.4 whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

2.2 We may also collect data in the following ways:

IP Address

2.2.4 We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration and to report aggregate information. This is statistical data about our users’ browsing actions and patterns and does not identify any individual.

Cookies

2.2.5 Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.

2.3 We may use your personal data for our legitimate interests in order to:

2.3.4 provide you with information, or services that you requested from us;

2.3.5 allow you to participate in interactive features of our Site, when you choose to do so;

2.3.6 ensure that content from our Site is presented in the most effective manner for you and for your device;

- 2.3.7 improve our Site and services;
- 2.3.8 process and deal with any complaints or enquiries made by you; and
- 2.3.9 contact you for marketing purposes (see section 6 for further details).

2.4 Website Links

- 2.4.1 Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. When you leave our Site, we encourage you to read the privacy notice/policy of every website you visit.

3 Customers

- 3.1 We will collect details such as name and contact details when you place an order for services from us. We will use this information to process your order and comply with our contractual obligations.
- 3.2 In order to perform our contact with you, we may also need to share personal data with third parties such as suppliers who are delivering materials directly to site, and sub-contractors who will carry out work on our behalf.
- 3.3 We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary);
- 3.4 We will retain your information as long as we require this to provide you with the services ordered from us and for a period of 6 years from our last contact with you.

4 Suppliers and Sub-contractors

- 4.1 We will collect details such as name and contact details, and, in the case of sub-contractors, bank details, NI number and Unique Tax Reference. This is in order to contact you about goods or services ordered with you, to place further orders, and to pay you for the goods and/or services supplied. We will keep the personal data for 6 years further to being provided with the goods/services.

5 If you fail to provide personal data

- 5.1 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with our services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

6 Marketing

- 6.1 In addition to the uses described in sections 2-4 above, where you indicate you would like to receive marketing correspondence from us, subscribe to our mailing lists or newsletters, enter into any of our competitions, or provide us with your details at networking events, we may use your personal data for our legitimate interests in order to provide you with details about our services and business updates which we think may be of interest.
- 6.2 You have the right to opt-out of receiving the information detailed in section 6.1 at any time. To opt-out of receiving such information you can:
 - 6.2.1 tick the relevant box situated in the form on which we collect your information;

- 6.2.2 clicking the unsubscribe button contained in any such communication received; or
 - 6.2.3 email us at marketing@bagnalls.co.uk or call 01274 714 800 providing us with your name and contact details.
- 6.3 We may share your details with third parties who design and administer our marketing correspondence. You will be given the opportunity of unsubscribing from our mailing lists by clicking on the appropriate link in these emails.

7 Monitoring and Recording

- 7.1 We may monitor email communications with you for the purpose of IT security.
- 7.2 We have CCTV cameras installed in our premises for the purpose of crime prevention or detection, the apprehension and prosecution of offenders, for health and safety reasons and to assist with investigations relating to internal disciplinary and grievance matters.
- 7.3 The areas to be covered by CCTV will be limited to covering those areas necessary to achieve our security objectives.
- 7.4 Only authorised persons are allowed access to CCTV footage. The systems are located in rooms which are suitably secured.
- 7.5 Signs informing those visiting the site of the presence of CCTV monitoring will be displayed prominently on site.
- 7.6 We will share footage from CCTV with police where requested in writing (or where a verbal request will be followed up in writing).
- 7.7 Any request to share CCTV footage with a third party must be authorised by a Director.
- 7.8 We retain CCTV footage for up to 28 days before deletion, except where it must be retained for the purposes of crime prevention, detection or apprehension and prosecution of offenders, or because it is required for an ongoing disciplinary or grievance matter. Where this is the case, it will be deleted without delay when the matter is closed.
- 7.9 We do not record telephone communications.

8 Automated Processing

- 8.1 We do not undertake automated decision making with your personal data.

9 Legal Basis for Processing

- 9.1 We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:
 - 9.1.1 for performance of a contract we enter into with you;
 - 9.1.2 where necessary for compliance with a legal or regulatory obligation we are subject to; and
 - 9.1.3 for our legitimate interests (as described within this policy) and your interests and fundamental rights do not override these interests.

- 9.2 Where the basis for processing does not fall within one of the categories above, we will obtain explicit, informed consent for collecting the data which is recorded. You may withdraw your consent at any time.

10 Disclosure of Personal Data to Third Parties

- 10.1 In addition to the third parties mentioned above, we may disclose your information to third parties for our legitimate interests as follows:

- 10.1.1 to staff members in order to facilitate the provision of services to you;
- 10.1.2 to our affiliated entities to support internal administration;
- 10.1.3 IT software providers that host our website and store data on our behalf;
- 10.1.4 professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;
- 10.1.5 HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and
- 10.1.6 third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other business or merge with them. If a change happens to our business then the new owners may use your personal data in the same way as set out in this privacy policy.

- 10.2 Where we use any third-party to process personal information on our behalf (e.g. Recruitment, Hosting etc), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they meet and understand their GDPR obligations.

- 10.3 We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- 10.4 We will not sell or distribute personal data to other organisations without your approval.

11 Cross-Border Data Transfers

- 11.1 We will not transfer your personal data outside the European Economic Area (EEA).
- 11.2 We have legal agreements in place with organisations who may process personal data outside the UK, within the EEA to ensure that appropriate data security safeguards are in place.

12 Data Security

- 12.1 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.
- 12.2 Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. These include:

- 12.2.1 use of VPN;
 - 12.2.2 password policies;
 - 12.2.3 data loss prevention;
 - 12.2.4 Automatic updates;
 - 12.2.5 firewall devices;
 - 12.2.6 network security; and
 - 12.2.7 cybersecurity and GDPR training.
- 12.3 To ensure the ongoing effectiveness of our security measures, we conduct regular assessments of our data protection systems. These include penetration testing, vulnerability scanning and security audits to identify and address weaknesses and vulnerabilities.

13 Data Protection Impact Assessments (DPIA)

- 13.1 We are aware of our obligations to undertake a DPIA where we process personal information that is considered high-risk, involves large scale processing or includes special category/criminal conviction data. Our documentation process allows us to record each assessment, to rate the risk posed by the processing activity, and to implement mitigating measures to reduce the risk posed to the data subject(s).

14 Access to, Updating, Deleting and Restricting Use of Personal Data

- 14.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes.
- 14.2 Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to info@bagnalls.co.uk. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 14.3 You can also ask us to undertake the following:
- 14.3.1 update or amend your personal data if you feel this is inaccurate;
 - 14.3.2 remove your personal data from our database entirely;
 - 14.3.3 send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or
 - 14.3.4 restrict the use of your personal data.
- 14.4 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal

data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

- 14.5 Please send any requests relating to the above to the Company Secretary at info@bagnalls.co.uk specifying your name and the action you would like us to undertake.

15 Right to Withdraw Consent

- 15.1 Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at info@bagnalls.co.uk.

16 Record Keeping

- 16.1 We keep a full record of all data processing activities involving personal data. These records detail the following:
- 16.1.1 types of personal data processed;
 - 16.1.2 lawful basis for processing data;
 - 16.1.3 categories of data subjects involved;
 - 16.1.4 location of data held;
 - 16.1.5 origin of data held;
 - 16.1.6 any third parties with whom data is shared;
 - 16.1.7 security measures in place; and
 - 16.1.8 data retention periods.

17 Changes to our Data Protection and Privacy Policy

- 17.1 We reserve the right to update this Data Protection and Privacy policy at any time. Changes we make will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

18 Contact Us

- 18.1 Our HR Director oversees compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Company Secretary at Penkrige, Dyehouse Drive, West 26 Industrial Estate, Cleckheaton, BD19 4TY. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

Signature:

Date: 16.09.24



E.H. Jobs – HR Director