



**IMPERIAL
SAFETY**
CONSULTANCY WALES

PRIVACY POLICY



1.0 INTRODUCTION

- 1.1 This Privacy Policy ("Policy") relates to the website www.imperialsafety.co.uk and/ or mobile application for such website (together the "Website") and to those who contact Imperial Safety Consultancy Wales Limited or deal with us in any way.
- 1.2 This Policy should be read carefully as it contains important information about how we use and process your information
- 1.3 This Policy will be reviewed from time to time, this Policy was last updated on 1st September 2020.

2.0 ABOUT US

- 2.1 The terms "Imperial Safety" or "us" or "we" refers to Imperial Safety Consultancy Wales Limited, the owner of the Website. We are a company registered in England and Wales under company number 12825646. The term "you" refers to the individual access and/or submitting information to us.
- 2.2 Imperial Safety respect your privacy and we are committed to protecting your personal data.
- 2.3 We, as the Data Controller, can be contacted via our representative Chloe Caramitsos Warman (Director), via email on chloe@imperialsafety.co.uk or call 01633 383 308.

3.0 DATA PROTECTION

- 3.1. "Privacy and Data Protection Requirements" means: the Data Protection Act 1998 (until repealed) ("DPA"), the Data Protection Directive (95/46/EC) (until repealed) and, from 25 May 2018, the General Data Protection Regulation 2016/679 ("GDPR") or any equivalent provision which may replace the GDPR following the formal political separation of the United Kingdom from the European Union; the Regulation of Investigatory Powers Act 2000; the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699); the Electronic Communications Data Protection Directive (2002/58/EC); the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003); and all applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction; and
 - 3.1.2 "Personal Data", "Data Controller" and "Data Processor" and "processing" shall have the meanings given to them in the DPA or, from 25 May 2018, the GDPR.
 - 3.1.3 For the purposes of applicable Privacy and Data Protection Requirements, we are a Data Controller and therefore we are responsible for, and control the processing of,

your Personal Data in accordance with applicable Privacy and Data Protection Requirements. "Personal Data" has a legal definition but, in brief, it refers to information relating to an identifiable.

4.0 INFORMATION WE MAY COLLECT ABOUT YOU

4.1 When you use the Website and/or when you otherwise deal with us we may collect the following information about you ("Information"):

4.1.1 Personal information such as first and last name;

4.1.2 Contact information such as current residential or business address, email address and telephone number;

4.1.3 Technical information including IP address, operating system, browser type and related information regarding the device you used to visit the Website, the length of your visit and your interactions with the Website;

4.1.4 Details of any enquiries made by you through the Website or us by phone or email, together with details relating to subsequent correspondence (if applicable).

4.2 To enable us to provide our contracted services we will from time to time be given access to potentially sensitive personal information. To the extent that information we collect is health data or another special category of personal data subject to the European Union's General Data Protection Regulation ("GDPR"), we ask for your explicit consent to process the data. This information may be provided to us by you or your staff originating from:

4.2.1 Accident and incident reports.

4.2.2 Risk Assessments.

4.2.3 Health and safety audits and inspections.

4.2.4 Training records.

4.3 We do not share this information with anyone other than for legal reasons or to protect the physical safety of an individual, nor do we use this information for any type of promotional or marketing activity, either to the specific individual concerned or to anyone else.

5.0 HOW LONG DO WE KEEP YOUR DATA?

5.1 As part of our process we collect information we need to communicate with you such as contact names, email addresses, office / business address and telephone numbers. This is the only personal information we need to create the account. We use this information to provide the contracted services. We do not share your account information with anyone

other than those specifically assigned to deliver the contracted services. We will keep your account information for as long as your account is in existence as we need this to operate your account.

- 5.2 We retain information as outlined in clause 4.2 for the minimum possible period, this will be specified depending on the services we will be providing you and the duration we are appointed to provide you with contracted services. Paper data is scanned and indexed then destroyed in a secure facility. Any digital data is encrypted and stored in secure online servers and then deleted at the end of the agreed retention period.
- 5.3 When carrying out an assessment under clause 4.2 that results in us collecting personal information we will notify each individual concerned letting them know what we intend to do with the data, how it will be stored and giving them specific instructions for contacting us if they want to obtain a copy of the data or to ask us to delete the data prior to the end of the agreed retention period.

6.0 KEEPING YOUR INFORMATION SECURE

- 6.1 We work hard to keep your data safe by using a combination of technical, administrative, and physical controls to maintain the security of your data.
- 6.2 While we will use all reasonable efforts to safeguard your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Information that is transferred from you or to you via the internet.

7.0 LEGAL BASIS FOR PROCESSING YOU INFORMATION

- 7.1 From 25 May 2018, under applicable Privacy and Data Protection Requirements we may only process your Information if we have a “legal basis” (i.e. a legally permitted reason) for doing so. For the purposes of this Policy, our reasons for needing to process your Information and our legal basis for do so are set out in the table below:

Purpose / activity	Lawful basis for processing data including basis of legitimate interest
Responding to initial enquiries about our services from prospective clients or employees of prospective clients.	Performance of a contract with you and necessary for our legitimate interests to be able to discuss our services with clients or employees of prospective clients.
Register you as a new client or to register an organisation for which you work as a new client.	Performance of a contact with you and necessary for our legitimate interests to be able to register a new client or employee of a client.

To provide our services and act generally on the matter which we are instructed.	Performance of a contact with you necessary for our legitimate interests to be able to provide you with services in connection to the matter on which we are instructed.
To manage our relationship with our client which include: - Managing payments, fees, and charges - collecting and recovering money owed to us - notifying our client about changes to any of our terms or policies	Performance of a contact with you and necessary for our legitimate interests to recover debts due to us.
To investigate and address any comments, queries or complaints made by your regarding the services.	To investigate and address any comments, queries or complaints made regarding the services.
To operate, administer, maintain, provide, analyse and improve the Website and the services we offer and to ensure that the content from the Website is presented the most effective manner for your and for your device.	This processing is necessary for the legitimate interest we pursue.

8.0 YOUR RIGHTS

8.1 If you are an individual, this section sets out your legal rights in respect of any of your Personal Data that we are holding and/or processing. If you wish to exercise any of your legal rights, you should put your request in writing to us giving us enough information to identify you and respond to your request:

8.1.1 You have the right to request access to information about Personal Data that we may hold and/or process about you, including: whether or not we are holding and/or processing your Personal Data; the extent of the Personal Data we are holding; and the purposes and extent of the processing.

8.1.2 You have the right to have any inaccurate information we hold about you be corrected and/or updated. If any of the Information that you have provided changes, or if you become aware of any inaccuracies in such Information, please let us know in writing giving us enough information deal with the change or correction.

8.1.3 You have the right in certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance purposes. If this is the case, we will let you know.

- 8.1.4** You have the right in certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing (see clause 14.6).
- 8.1.5** You have the right to request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is not available to you, we will let you know.
- 8.1.6** You have the right in certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.

9.0 'COOKIES' AND RELATED SOFTWARE

- 9.1** Our software may issue 'cookies' (small text files) to your device when you access and use the Website and you will be asked to consent to this at the time (e.g. when you first visit our website). Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites.
- 9.2** Our Website uses cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. The information is used to track user interactions with the Website and allows us to provide you with a good experience when you access the Website, helps us to improve our Website, and allows us to compile statistical reports on Website visitors and Website activity.
- 9.3** You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Website features may not function if you remove cookies from your system. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org.

10.0 COMPLAINTS

- 10.1** If you are not happy with our privacy policy or if have any complaint then this can be raised via email to Chloe Caramitsos Warman (Director) via email on chloe@imperialsafety.co.uk.
- 10.2** Our full Complaints Policy can be view upon request.

10.3 If you have any concerns about how we collect or process your Information then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns/>.

11.0 CHANGE TO THIS POLICY

11.1 We keep this Policy under regular review and may change it from time to time. If we change this Policy we will post the changes on this page, and place notices on other pages of the Website as applicable, so that you may be aware of the Information we collect and how we use it at all times. You are responsible for ensuring that you are aware of the most recent version this Policy as it will apply each time you access the Website.

12.0 ACCESSIBILITY

12.1 This Policy aims to provide you with all relevant details about how we process your Information in a concise, transparent, intelligible, and easily accessible form, using clear and plain language. If you have any difficulty in reading or understanding this Policy, or if you would like this Policy in another format (for example audio, large print or braille), please get in touch with us.

13.0 FURTHER INFORMATION AND FEEDBACK

13.1 We value and welcome your feedback and questions on this policy. If you wish to contact us, please email us at, or alternatively call us on 01633 383 308.

