



## **ELMILL LTD PRIVACY POLICY**

Elmill Ltd is a public limited company, registered in England and Wales (number 03287695) whose registered office is at 139A Engineer Road, Westbury, Wiltshire BA13 4JW

### **General Statement of Intent**

Elmill Ltd takes the privacy of its customers, suppliers, and staff very seriously. This policy relates to all personal data (i.e. information from which a living individual can be identified, either on its own or when combined with other information) which is requested, collected, stored, used or otherwise processed by Elmill Ltd in the pursuance of its activities. Elmill Ltd takes reasonable care of all personal data, ensuring it is kept secure and preventing any unauthorised access or unlawful use of it. All information is processed in accordance with the applicable UK data protection legislation and The General Data Protection Regulation (GDPR).

### **Collection of Personal Data**

The GDPR states that personal data may only be collected for specified, explicit and legitimate purposes. Elmill Ltd collects personal data from customers and suppliers as follows:

- Where a customer contracts with us for the provision of any goods or services, we will collect contact details about the individuals within the customer organisation, e.g. names, email addresses and telephone numbers.
- If you contact us for any other purpose, for example prospective sales enquiries, responses to job advertisements, shareholder enquiries, general company information requests and/or marketing enquiries, we may keep a record of that contact and the information you provide us with at that time including your name, e-mail address, correspondence address and telephone number.

### **Personal Data**

The GDPR states that personal data must be processed lawfully, fairly and transparently. The personal data collected by Elmill Ltd may be used for a number of different purposes as follows:

- Where a customer contracts with us for the provision of any goods or services, we will use the contact details about the individuals within the customer organisation to perform our contractual obligations and for ancillary internal management purposes which are compatible with the original purpose.
- If you contact us for with a prospective sales enquiry, we will use the information provided to deal with that enquiry, on the basis that we have a legitimate interest to do so (e.g. to follow up prospective sales leads and support tendering activities as well as for ancillary record keeping and internal management purposes).
- If you contact use to make a complaint, we will use the information provided to respond to the complaint, on the basis that we have a legitimate interest to do so (e.g. to enable us to ensure that you are satisfied with our services and to ensure that our business remains competitive in the market).

## **Security and Storage of Personal Data**

Elmill Ltd stores the personal data that it holds electronically and in some cases in paper copy format. All electronic data is held in a secure manner. Access to this data is strictly controlled and in accordance with GDPR good practice guidelines. Electronic data which is lost or corrupted following an IT related incident is recoverable from daily backup tapes. If there are any paper copies of any data this is held in a secure place and access is restricted only to the manager of the relevant business area requiring the information.

Any personal data you provide to us will be treated in the strictest confidence. However, please be aware that despite the security measures we have in place, no computer system is completely secure and there is always some degree of risk whenever personal data is transferred by electronic means.

All information you provide to us is stored on our secure servers located in the United Kingdom.

## **Updating of Personal Data**

In the event that there is a change to any of the personal data that we hold about you, please inform us of these changes in writing. To do this, please contact us by any of the means referred to below (under the section entitled **Contacting Us**).

## **Data Retention**

We will only retain personal data for as long as is necessary having regard to the purpose for which it was collected. As a general rule, we will keep information for no longer than 10 years. This is to ensure compliance with tax, security, contract specific requirements and to ensure we have relevant information the event of a historic employment or warranty claim. When Elmill Ltd disposes of any personal data, it does so securely and permanently.

## **Links to other websites**

Our website may, from time to time, contain links to other websites which may be of interest to you. If you follow a link, please note that the other websites will have its own privacy policy and you should check this before you submit any personal data to that website.

Your Rights in relation to the Personal Data we hold

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. To do this, please contact us by any of the means referred to below (under the section entitled **Contacting Us**). Your personal data will be provided free of charge (unless the request is unreasonable or excessive in which case a small fee may be charged or we may limit the level of information provided) and within 30 days in accordance with the GDPR requirements.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however,

that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your Personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### Contacting Us

If you have any queries about this privacy statement or any complaints about the way in which we handle your personal data, please contact us using one of the following options:

- Website [www.elmill.com](http://www.elmill.com)
- E-mail: [sales@elmill.co.uk](mailto:sales@elmill.co.uk)
- Post: Company Secretary, Elmill Ltd, 139A Engineer Road, Westbury, Wiltshire BA13 4JW
- Telephone: 01373 864267

We will investigate any complaint promptly with a view to resolving the matter as swiftly as possible.

#### Complaints

You have the right to complain to the Information Commissioner about the way in which we collect and use your personal data: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone 0303 123 1113.

#### Changes to this privacy policy

This policy is effective from 25 May 2018. We aim to meet high standards and our policies and procedures are, therefore, constantly under review. From time to time we may change our security and privacy policies. Accordingly, we recommend that you check this page periodically in order to review our current policy.