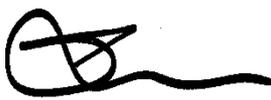




Privacy Policy

Owner:	Human Resources
Version:	1.0 31/01/2019 1.1 31/01/2020- Minor amendments
Adopted on:	31/01/2020
Signed off by:	 Scott Turner, Managing Director
Date for review:	30/01/2021

1. INTRODUCTION

SW Turner Process & Mechanical Pipework Installation Specialists Limited is a company registered in England and Wales with company number 03813806. Our registered office is Unit F, The Wallows Industrial Estate, Off Wallows Road, Brierley Hill, West Midlands, DY5 1QB. All references in this policy to, "SW Turner LTD", "The Company", "we" "us", "our" are references to SW Turner Process & Mechanical Pipework Installation Specialists Limited.

In the course of our business, we may need to collect and use your personal data for various purposes. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Your privacy matters to us and we take our responsibilities to manage your personal data seriously. This Privacy Notice sets out SW Turner LTD policies and practices regarding our collection and use of your personal data.

2. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data in a number of ways including (but not limited to) the following:

- Your placing of an order with us for works or services
- Your completion of customer surveys or feedback
- Your request for marketing information from us
- Website usage information collected via cookies
- Social media communications
- Offline marketing campaigns linked to our website
- Business cards
- Meetings that we attend during the course of business

Typically, the type of personal data that we collect is limited to the type of information that is on a business card, being first name, surname, marital status, job title, company name, company address, business email address and business telephone number (including mobile telephone number).

Sometimes we may ask you for other information for a specific purpose. For example, we may ask about dietary requirements, hobbies and the location of your home for the purposes of hosting an event to which you are invited. It will always be optional that you provide us with this information.

3. HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal data when the law allows us to do so. We collect information about you so that we can perform the contract we have entered into or are about to enter into with you, that is, to process any order and manage your account. We will also use your data to email you about our products and services which might be of interest to you. This will be for the purposes of our legitimate business interests of conducting and managing our business to enable us to give you the best services and products and the best and most secure experience. We will not use your personal data for this purpose if your fundamental rights override this.

If you have consented to us doing so, we may also use your personal data for references and case studies in our portfolios and marketing collateral. We may also process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on your consent as the basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. We will get your express consent before we share your information for marketing purposes with other companies.

In processing your order, we may send your details and also use information from credit reference agencies, external marketing service providers and fraud prevention agencies. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. MARKETING

We would like to send your information about our products and services which may be of interest to you. If you have consented to receive this type of information, you may opt out at a later date. You may at any time stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please let us know.

4.1 YOUR RIGHTS

You have the following rights:

- The right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at ameliaturner@swturner.com or FAO The Data Privacy Manager, SW Turner Process & Mechanical Pipework Installation Specialists LTD and please head your email or letter "DATA PRIVACY ENQUIRY".
- We want to make sure that your personal information is accurate and up-to-date. You can ask us to correct or remove any information you think is inaccurate.
- You can also ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- You can 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.
- You can object to our 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.
- You can 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.

4.2 COOKIES

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. Further information can be found at www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. In a small number of cases, some of the functions of our website may not function as a result.

5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside of the European Economic Area.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

8. HOW TO CONTACT US

Please contact us if you have any questions about our privacy notice or information we hold on you:

- By email to ameliaturner@swturner.com
- Or write to us at Data Privacy Manager, Unit F Wallows Road Industrial Estate, Off Wallows Road, Brierley Hill, West Midlands, DY5 1QB.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.