

Address Shamrock Lodge, Prees Heath, Whitchuch SY13 3JX

## Introduction

This is our policy and statement of the purposes for which we hold personal data about our customers, employees and others who work for us.

McFour Ltd is committed to protecting your personal information and respecting your privacy.

This Privacy Policy sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us.

For the purpose of the General Data Protection Regulation [the GDPR], the data controller is McFour Ltd, whose registered office is Shamrock Lodge, Prees Heath, Whitchuch SY13 3JX.

We may update this Privacy Policy from time to time. Any changes we make in the future will be posted on our website at [www.mcfour-ltd.co.uk](http://www.mcfour-ltd.co.uk). Please check back regularly to see any updates or changes to this Policy.

## Data Protection Contact

The contact details for our Secretary Jackie Davies for any data protection queries is as follows:

jackie@mcfour-ltd.co.uk  
01948 667024

## Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## General

We will collect, hold and process information consisting of personal data including sensitive personal data (see paragraphs below) about all our employees, applicants for employment, self-employed contractors, agency workers and others who work for us, who are referred to in the Data Protection Act 1998 as “data subjects”.

The purpose for which we hold any information about data subjects is for use solely for administrative and personnel management purposes, including but not limited to: recruitment, appraisals, performance, promotion, training, career development, pay and remuneration, health and safety, discipline and grievances and the review of our human resources policies.

## Your rights as a data subject

It is important that we tell you your rights that you have as a data subject under the General Data Protection Regulation - these are set out below.

The General Data Protection Regulation provides the following rights (subject to some exemptions):

- The right to request access to the personal data that we hold about you;
- The right to request rectification of the personal data that we hold about you;
- The right to request erasure of the personal data that we hold about you;
- The right to request restriction of processing about you;
- The right to object to processing; and
- The right to data portability.

If at any point you believe the information we process on you is incorrect, incomplete or out of date then please let us know and we will make sure that your data is corrected.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Secretary at the details above

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner’s Office (ICO) full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

## Security

We will endeavour not to keep your personal information for longer than we have to for us to fulfil our obligations to you. Where it is not possible for us to delete your data, we will ensure the appropriate security and organisational measures are put in place to protect the use of your data.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible the confidentiality, integrity and availability of your information at all times.

## How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

We will generally process your personal data for contractual necessity. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing. This may include:

To maintain our records and other administrative purposes, including updating your details and preferences.

To assist with queries, complaints and dispute resolution;

We will ask for your direct consent IF we intend to use your personal data for marketing purposes. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify the Secretary using the contact details set out above.

You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Information Commissioner’s Office, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

## Recipients of Data

We may use service providers to help us provide you with our services. Personal data may be transferred to such service provider, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed.

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Such third parties have contracted with us as data controllers / processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data controllers / processors contract, but only to the extent necessary to perform their services for us.

These data controllers / processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

In appropriate circumstances we may disclose data to authorised bodies as required by law.

This policy will be formally reviewed no longer than on an annual basis

Signed



Date 18/05/18

Next review date 01/02/19