

Privacy Policy

Introduction

Maintaining the security of your data is a priority of Seward Refrigeration Ltd, and we are committed to respect your privacy rights. We undertake to handle your data fairly and legally at all times and we are also dedicated to being transparent about what data we collect from you and we may use such data.

This privacy notice aims to explain the types of personal data Seward Refrigeration Ltd may collect about you when you interact with us whether you visit our office, use your mobile device or go on line. It also aims to explain how we will process, share and keep your data.

We hope this will answer any questions you have, but if you still have any questions, please get in touch with us.

As we may need to update this notice from time to time, we will update you if there are any significant changes, however please feel free to check this notice as you wish from time to time.

Seward Refrigeration Ltd is a registered company in England and Wales and will gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and law. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

Seward Refrigeration Ltd is also registered with the Information Commissioner's Office.

Why do we collect your personal data

We may collect and process your personal data for a number of reasons. These reasons include:

- so that we may comply with any legal obligation we have;
- in order to comply with our duties and exercising our rights under a contract with you;
- the pursuit of our legitimate interests (as set out below); or
- where you have consented to the processing.

This includes, but is not limited to, information you provide:

- when you contact us in person, on our website, over the telephone, by e-mail or by post;
- when you purchase any of our products or services
- when you apply for a job vacancy with us.

Our legitimate interests

The normal legal basis for processing customer data, is that it is necessary for the legitimate interests of Seward Refrigeration Ltd, including:

- selling and supplying our products and services
- protecting customers, employees and other individuals and maintaining their health, safety and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behaviour, activities, preferences and needs;
- improving existing products and service and developing new products and services;
- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries or disputes;
- protecting Seward Refrigeration Ltd, its employees and customers, by taking appropriate legal action against third-parties who have committed criminal acts or are in breach of legal obligations to Seward Refrigeration Ltd; and
- fulfilling our duties to our customers, employees, shareholders and other stakeholders.

The purposes and reasons for processing your personal data

We take your privacy very seriously and will never disclose or share your personal data without your knowledge, unless we are required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Unless we notify you, we will not process your personal data outside of the European Economic Area (EEA), as it is currently defined.

Detailed below are examples of when we would collect, process and in some cases share, your personal data:

- to ensure that content from our website is presented in the most effective manner for you and for your computer/device;
- to verify your identity;
- to process job applications;
- to process and manage your purchase of a product from us and provide after sales services where applicable;
- to facilitate the provision of warranties;
- to monitor customer satisfaction;
- to provide you with information, products or services that you request from us;
- to notify you about changes to our services; and/or

Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time.

Automated decision making

We do not use your personal data to make automated decisions i.e. no decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Special categories of personal data

We do not collect or process any special categories of personal data unless we are required to by law such as in the event of a court case.

The use of protective and pre-emptive safety features

We use CCTV at our main office, for the safety of and prevention of any crimes committed against our staff, our customers, our equipment and our property, not for other monitoring purposes.

In the event of any criminal investigations, we may be required by law, to share the data captured with the relevant authorities.

How long will we keep your data

We only ever retain personal information for as long as is necessary and we have retention policies in place to meet these obligations. We are required under some laws or regulations to retain your personal data for a set period of time for example, the maximum legally obliged retention period for certain health and safety related matters is 40 years. Where there is no legal obligation, for example around direct marketing information, we will hold your data for 2 years, unless you opt out within this time.

Some specific areas include, but are not limited to:

- Health & Safety related matters– up to 40 years
- Direct marketing – up to 2 years
- Other data will be held for up to 6 years in line with the statute of limitations

How we will share your data

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

We use trusted third-parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

We may disclose your information to third parties if:

- we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or

- in order to apply or enforce our contracts with you; or
- to protect our rights, property, or our safety and/or the safety of our customers, or others.

We may also disclose your information to our suppliers and contractors to provide information to you on our behalf and/or in order to fulfil our contracts with you.

These third parties may include:

- our suppliers,
- training providers

Social media and marketing

We try to ensure that our communications are as effective and relevant as possible so that we make the best use of the money we spend on them.

We may also use information about how you use our website or interact with our emails so we can make them more effective (please refer to the Cookie Policy for more details).

We will also, on occasion, use the information you provide us to target our digital and social media advertising effectively. This could include securely providing contact details such as your name and email address to digital advertising networks or social media companies such as Facebook, Google and Twitter. Any information we share with social media companies will be shared in an encrypted format and will not be used for their own purposes

If you would prefer we didn't use your information to provide you with marketing materials in any of the ways listed above, then you have the right to tell us to stop and can do so by getting in touch with us using the details in the "contact us" section.

You may still see adverts relating to Seward Refrigeration Ltd, even after you have asked us not to use your information for targeted digital advertising, because the social media site or advertising network may select you based on information they hold, such as your age and location, or websites you have visited, without using information that has been provided by us. You can control the kind of advertising which you see through the relevant social media sites directly.

What are your rights over your personal data

You have the right to access any personal information that we process about you and to request information about:

- What personal data we hold about you.
- The purposes of the processing.
- The categories of personal data concerned.
- The recipients to whom the personal data has/will be disclosed to.
- How long we intend to store your personal data for.
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as

quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

If you would like your personal data to be removed or the use to be amended, you have the right to request:

- your personal data to be erased (deleted) from our records;
- the use / processing of your personal data to be restricted in accordance with data protection laws;
- to opt out of any direct marketing from us (this can be done in a number of ways and will depend on the marketing you are receiving. Please see the marketing material for how to unsubscribe);
- to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

We will inform you if your request is possible under current regulations and inform you to what extent your request has been processed. Where we are under legal obligation to retain your information, we will clarify the requirements around the extent of data as well as the duration we will continue to hold your personal data.

If you would like to make a request around the processing of your personal data, please contact: info@sewardrl.co.uk

If you wish to use our services, or work with us

You are not obligated to provide your personal information to us however, as this information is required for us to provide you with our services, we will not be able to offer our products or services without it.

- As a customer or potential customer, your personal data may be required i.e. contact details.
- As a new employee, whether permanent or contract, your personal data is required to process your application and complete the contract of employment. A privacy notice for job applicants will be provided once we have received your application.

Further details, questions, or complaints

We hope we have provided you with plenty of information around the processing of your personal data that we undertake and the rights you have over it, however if you have any additional questions or would like more details around any of the points listed above, please contact:

Seward Refrigeration Ltd
Unit 8 Platinum Road
Manchester
M41 7LJ

Email: info@sewardrl.co.uk

Or please contact our Data Protection Officer:

Jenny Hatfield

Email: jenny@sewardrl.co.uk

Lodging A Complaint

If you are not happy with this notice, believe we have processed your data in an unfair or unjust way or are non-compliant with the relevant data protection laws and you wish to raise a complaint, please contact us and we will carefully consider your complaint and respond to you. You also have the right to lodge a complaint with the supervisory authority (the Information Commissioners Office).

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745