

Commercial Data Protection Policy

1. PRIVACY STATEMENT

- 1.1 Specialist Hires Limited (“we”/“us”/“our” etc) is committed to protecting the privacy of your personal data collected in the course of our business, including via the website www.envirogard.co.uk (the “Site”). This Data Processing Policy forms part of our trade practice as well as part of the terms and conditions for use of and access to the website.
- 1.2 We as a business are dedicated to upholding standards within the field of equipment sales, hire and rental and we can be contacted on 01233 720948 or by email to accounts@envirogard.co.uk.
- 1.3 Our Data Protection Officer is John Henderson who can be contacted at our accounts office - address, phone number and email details as shown in the “Contact” section of our website www.envirogard.co.uk.
- 1.4 We will always seek to comply (and be able to demonstrate our compliance) with relevant data protection legislation, including the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulation (“GDPR”) as applicable, when processing your personal data. Further details on the DPA and GDPR can be found at the Information Commissioner’s Office website (www.ico.gov.uk). For the purposes of data protection legislation, we will be the “controller” or “data controller” of all personal data held in respect of this Policy.

2. DATA PROCESSING

- 2.1 In this Policy we use certain terms from the relevant data protection legislation;
 - (a) “data subject” i.e. anyone who can be identified from personal data;
 - (b) “controller/data controller” i.e. a business which holds personal data and decides how it should be processed;
 - (c) “processor/data processor” i.e. a business which holds personal data on behalf of a controller and processes it in accordance with the controller’s instructions;
 - (d) “personal data” i.e. recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you;
 - (e) “special categories of personal data” i.e. personal data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life & sexual orientation;
 - (f) “processing” i.e. doing anything with personal data including collecting, using, storing, accessing, disclosing and destroying it.

- 2.2 We will process your personal data in accordance with the following principles:
- (a) all personal data must be processed lawfully, fairly and in a transparent manner;
 - (b) all personal data must be collected for one or more specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes;
 - (c) all personal data shall be restricted to what is adequate, relevant and limited for those purposes;
 - (d) all personal data shall be kept accurate and up to date (and reasonable steps must be taken to erase or rectify inaccurate personal data);
 - (e) all personal data must be kept for no longer than is necessary for those purposes;
 - (f) all personal data must be protected by appropriate technical and organisational security measures to prevent unauthorised or unlawful processing and accidental loss, destruction or damage.
- 2.3 We may collect, use and store your personal data, as described in this Policy, where necessary in order to:
- (a) perform any contract to which you are party or in order to take steps at your request prior to entering into a contract;
 - (b) exercise our legitimate business interests;
 - (c) carry out other functions with your specific consent.
- 2.4 We will use your personal data in order to operate and provide our business service, and to keep you updated about our other services and products. If you no longer wish to receive communications from you may amend your subscription setting at any time by contacting us in writing, by clicking on the “unsubscribe” link on any ebulletin you receive from us, or by emailing accounts@envirogard.co.uk.
- 2.5 We will only process your personal data to the extent that it is necessary for the purposes specified in this Policy and we will endeavour to keep the personal data we store about you accurate. Please let us know if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.
- 2.6 We will not keep your personal data for longer than is necessary for the purposes specified in this Policy. Where it is no longer required, it will be pseudonymised, anonymised, destroyed or erased as appropriate.
- 2.7 Your personal data will be used to provide our business service; the data will be used only by us and our associated businesses to provide our service to you.

Otherwise we will never sell your personal data or make it available to any third parties without your prior consent (which you are free to withhold) except where:

- (a) we use a processor, in which case we will require that the processor complies with this Policy and all relevant data protection legislation;
- (b) we are required to do so by law;
- (c) we sell any part of our business or assets (in which case we may disclose your personal data confidentially to the prospective buyer as appropriate in accordance with our legitimate interests).

2.8 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

2.9 We reserve the right to amend this Policy from time to time without prior notice. You are advised to check the Site regularly for any amendments.

2.10 Some of our data processors and third party service providers may be located outside of the European Union, such as in the US. We will only process personal data outside the EU subject to appropriate safeguards. These safeguards will usually consist of standard data protection clauses which we will adopt and implement with the relevant data processor or third party service provider.

3. **WHAT INFORMATION DO WE COLLECT AND WHY?**

3.1 We will only collect personal data to the extent that it is required in order to provide our business service; if for any another specific purpose this will be communicated to you at the time. We will only process personal data in accordance with relevant data protection legislation.

3.2 If you contact us, we may keep a record of that contact including your contact details and any relevant account information.

3.3 In addition to your contact details, we may log details of your interactions with us including those transacted through our websites.

3.4 Like most websites, our websites use cookies. These are small text files that are sent to your computer when you log into this site. By using a cookie we can keep track of your log-in status even if you leave the site and return.

- (a) NB: a cookie only tracks which device is logging on to the Site: it does not identify (and we do not record) who is using that device. (You may refuse to accept cookies by changing the settings on your browser. However, doing so may affect your ability to access or use certain parts of the Site. Please see our Cookie Policy published in the privacy statement on the website.)

3.5 Our webservice logs requests for Site content. By analysing this information, we can identify which parts of the Site are popular and which are not, helping us to improve the Site. The Site uses these log files to compile non-personal statistical information about matters such as length of stay on the Site, type of pages visited and other general information. This information is entirely anonymous: we want to know how people in general are using the Site, not what you in particular are doing on the Site.

3.6 We will hold your personal data on our systems for as long as:

- (a) your account remains valid; and/or
- (b) any contracts you make with us are live; and/or
- (c) is necessary to comply with our legitimate business interests; and/or
- (d) is necessary to comply with our legal obligations.

3.7 We will hold data in accordance with our Data Retention Policy.

3.8 We may use your personal data:

- (a) to carry out our obligations arising from any contracts entered into between you and us; or entered into with a third party at your behest
- (b) to provide you with information, products or services that you request from us or which we feel may interest you, including changes and updates (subject to any opt-out as set out in para 2.4 above);
- (c) to ensure that our website is presented in the most effective manner for you and for your computer;
- (d) in accordance with our legitimate business interests and legal obligations.

4. LINKS TO OTHER WEBSITES

4.1 The Site may from time to time contain links to other unrelated sites (including those of our advertisers). This privacy statement does not apply to these sites nor are we responsible for the content and practices of these websites. In particular, please note that such other sites may also use cookies, and that we have no control over this. Please refer to our Cookie Policy.

5. YOUR RIGHTS

5.1 You have the following rights in respect of your personal data held by us. Please send all requests in respect of these rights to our Data Protection Officer:

- (a) to access your personal data;

- (b) to be provided with information about how your personal data is processed (this information is set out in this Policy);
- (c) to have your personal data corrected where necessary (please contact our Data Protection Officer promptly should you become aware of any incorrect or out-of-date information);
- (d) to have your personal data erased in certain circumstances (please refer to the appropriate data protection legislation or consult the ICO for details);
- (e) to object to or restrict how your personal data is processed;
- (f) to have your personal data transferred to yourself or to another business.

5.2 If you consider that we have not complied with this Policy or the relevant data protection legislation in respect of your personal data or someone else's, you should in the first instance raise the matter with our Data Protection Officer. Any potential breach will be taken seriously and will be dealt with in accordance with the relevant data protection legislation.

5.3 If you are dissatisfied You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

<https://ico.org.uk/concerns/>

0303 123 1113.

5.4 For more details, please consult the relevant data protection legislation or address any questions, comments and requests regarding our data processing practices to our Data Protection Officer.