

Last Revised; 2nd June 2022

BACKGROUND:

Glenhead Engineering Ltd understands that your privacy is important to you and that you care about how your Personal Data is used. We respect and value the privacy of all our customers and contacts and will only collect and use Personal Data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Glenhead Engineering Ltd is a limited company registered in Scotland: SC277290.

Registered and Trading address: 58 Beardmore Way

Clydebank

G81 4HT

VAT number: GB 859 6881 50

Data Protection Officers: Sharon Colvan and Elizabeth Gilmour

Email address: info@glenheadengineering.co.uk

Telephone number: +44 (0)141 952 9945

Postal Address: 58 Beardmore Way

Clydebank

G81 4HT

United Kingdom

2. What Does This Notice Cover?

This Privacy Information Notice explains how we use your Personal Data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your Personal Data.



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3. What is Personal Data?

As defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR"), Personal Data is 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

In simpler terms, Personal Data is any information about you that enables you to be identified; obvious information such as your name and contact details, as well as less obvious information such as identification numbers, electronic location data, and other online identifiers.

The Personal Data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- (i) The right to be informed about our collection and use of your Personal Data. This Privacy Information Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- (ii) The right to request access to your Personal Data. Part 10 will tell you how to do this.
- (iii) The right to request rectification of inaccurate or incomplete Personal Data concerning you. Please contact us using the details in Part 11 to find out more.
- (iv) The right to request erasure (right to be forgotten), i.e. under certain circumstances, you may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data. Please contact us using the details in Part 11 to find out more.
- (v) The right to request restriction of processing your Personal Data.
- (vi) The right to object to us using your Personal Data for a particular purpose or purposes, however, such a right to object may in particular not exist if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.
- (vii) The right to request data portability. You have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used format and you may transmit the Data to another entity without hindrance from us.
- (viii) The right to obtain human intervention, express your point of view and contest any decision with respect to any automated individual decision-making systems that may be used.

For more information about our use of your Personal Data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.



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If you have any cause for complaint about our use of your Personal Data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

Through your use of our services, we may collect Personal Data from (especially, if you choose to provide it), including without limitation:

- Name
- Email
- Telephone number
- Gender
- Billing Address and Shipping Address
- Business name and sector
- Job title
- Profession
- Payment information

Your personal data is held with the following third parties:

- Sage 50 Accounts Professional for finance and administration purposes.
- *Progress Plus* for finance and administration purposes.
- Fasthosts for webmail for individual emails.
- Twitter when you like our page or interact with our Twitter feed.
- LinkedIn when you interact with our Staff and Employees who act on behalf of us.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using Personal Data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your Personal Data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.



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7. How Long Will You Keep My Personal Data?

Your Personal Data will be retained as long as necessary to provide you with the services and products requested. Once you have ended your relationship with us, we will either delete your Personal Data or anonymise your Personal Data, unless statutory retention requirements apply. We will not keep your Personal Data for any longer than is necessary considering the reason(s) for which it was first collected. Certain Personal Data will be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- To meet any financial reporting requirements such as inspections by HMRC (5 years accounting records).
- A maximum of 2 years for after any opt-out.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

9. Do You Share My Personal Data?

In some limited circumstances, we may be legally required to share certain Personal Data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority. Other than these circumstances, we will not share your Personal Data to third parties.

10. How Can I Access My Personal Data?

You have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. This is known as a "data access request".

All data access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Data Access Request Form is available for you to use as shown on the final page of this policy. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. However, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.



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We will respond to your data access request within 28 days and, in any case, not more than 28 days of receiving it. Normally, we aim to provide a complete response, including a copy of your Personal Data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

If you want to exercise your Data Privacy Rights as previously stated or you have any questions about this Privacy Notice, our contact information is as follows:

The Data Protection Officers of Glenhead Engineering Ltd can be contacted at:

Email: info@glenheadengineering.co.uk

Postal Address: 58 Beardmore Way

Clydebank

G81 4HT

United Kingdom

Attention: Sharon Colvan and Elizabeth Gilmour

Telephone: +44 (0) 141 952 9945

Fax: +44 (0) 141 951 1731

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects Personal Data Protection.

We will notify you of any such changes, including when they will take effect, by updating the 'Last revised' date above or as otherwise required by applicable law.



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Data Access Request Form (GDPR)

| Name: |
|---|
| Daytime telephone number: |
| Email: |
| Address: |
| By completing this form, you are making a request under the General Data Protection Regulation (GDPR) for information held about you by the Company that you are eligible to receive. |
| Required information (and any relevant dates): |
| |
| |
| |
| By signing below, you indicate that you are the individual named above. The Company cannot accept requests regarding your personal data from anyone else, including family members. We may need to contact you for further identifying information before responding to your request. You warrant that you are the individual named and will fully indemnify us for all losses, cost and expenses if you are not. |
| Please return this form to Sharon Colvan or Elizabeth Gilmour. |
| Please allow 28 days for a reply. |
| Data subject's signature: |
| Date: |