

# GDPR PRIVACY NOTICE

25 May 2018

## Introduction

This document refers to personal data. This is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) is the new European legal framework introduced to harmonise the data privacy regulatory environment in the EU and to protect and enhance the rights of data subjects.

These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU.

IMH Ltd is pleased to provide the following GDPR information:

## Who we are

IMH Ltd is principally involved in the design, development, manufacture, installation and commissioning of hydraulic power units and systems as well as the overhaul and refurbishment of hydraulic components and the stock and sale of hydraulic components.

## Personal data

IMH Ltd collects personal data of its employees and business contacts.

The ownership of the personal data rests with IMH Ltd, who is the Data Controller in respect of GDPR.

IMH Ltd has appointed a Data Protection Officer who has responsibility for the control of personal data and to whom requests for access to personal records or complaints on how personal data is being processed should be addressed.

## Employee data

Employee data is collected to enable IMH Ltd to satisfy itself that individuals are legally entitled to work within the United Kingdom and for the company and have the necessary professional qualifications to carry out the role for which they are employed. Data is also collected to allow IMH Ltd to meet its employment, compliance with legal requirements and legitimate interest obligations.

## Business contact data

Business contact data is collected to enable IMH Ltd to trade on the open market with companies who have an interest in the services and products that the company provides. This may involve making telephone, electronic and postal contact regarding business transactions and marketing information which the company believes may be of interest to a business. Business contacts making initial contact are deemed to be giving consent to IMH Ltd maintaining a marketing dialogue with them until they either opt-out (which they can do at any stage) or we decide to desist in promoting our services.

Some personal data may be collected about business contacts from the documents they complete, from records of correspondence and phone calls and details of visits to our website, including but not limited to personally-identifying information like Internet Protocol (IP) addresses. The company may from time to time use such information to identify its visitors and may also collect statistics about the behaviour of visitors to its website.

The company website does not currently use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. The company may introduce this facility in the future. The cookies would be used to identify and track visitors and their website access preferences. Visitors to the company website who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using websites that utilise them.

Any information IMH Ltd holds about customers and their business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

IMH Ltd will only collect the information needed so that it can provide businesses with trade and marketing services. It does not sell or broker the business data.

### **Lawful reasons for holding personal data**

IMH Ltd must have a valid lawful basis in order to process personal data. There are six available lawful bases for processing. Most lawful bases require that processing is 'necessary'. If the company can reasonably achieve the same purpose without the processing, they won't have a lawful basis.

The six lawful bases are:

1. Consent
2. Contract
3. Legal obligation
4. Vital interests
5. Public task
6. Legitimate interests

### **Consent basis for processing any personal data**

Through agreeing to this privacy notice you are consenting to IMH Ltd processing your personal data for the purposes outlined. Consent will also be obtained for marketing purposes and to hold sensitive data e.g. medical conditions. You can withdraw consent at any time by phoning or writing to us. See last section for contact details.

### **Contract basis for processing any personal data**

To fulfil our contractual obligations to you; or because you have asked IMH Ltd to do something before entering into a contract e.g. provide a quote.

### **Legal basis for processing any personal data**

To meet IMH Ltd obligations to employees and clients when processing personal data to comply with a common law or statutory obligation.

### **Vital interest basis for processing any personal data**

To disclose information about possible criminal acts or security threats to the authorities. To inform the emergency services of any medical conditions an individual may have.

### **Legitimate interest basis for processing any personal data**

To promote and market the services and products offered by IMH Ltd.

### **Duty to hold accurate information**

IMH Ltd will use best endeavours to ensure that all personal data that it holds on an individual is accurate and up-to-date. If an individual becomes aware that their personal data is incorrect, they can request at any time that it be corrected, changed or deleted by contacting the Data Protection Officer.

If personal data has been shared with any third parties, IMH Ltd will use its best endeavours to ensure that any alterations or deletions are notified to the relevant third parties.

### **Disclosure**

IMH Ltd may on occasions pass your personal information to third parties exclusively to process work on its behalf. IMH Ltd requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

IMH Ltd do not sell, rent, share, trade or disclose any personal data we keep on an individual to any other parties or pass on information gained from your engagement with the company without your consent.

However, the company may disclose your personal information to meet legal obligations, regulations or a valid governmental request.

The company may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of the company, its clients and/or the wider community.

## **Retention Policy**

IMH Ltd will process personal data during the duration of any business activities or employee employment and will continue to store only the personal data needed after the activities or employment has expired to meet any legal obligations. The expired retention periods are documented in the company retention policy. Once these retention periods are reached any personal data not needed will be deleted or destroyed.

## **Security of Personal Data**

IMH Ltd will implement technical and organisational measures to protect personal data against accidental or unlawful destruction, accidental loss or alteration, any unauthorised disclosure access (in particular where the process involves transmission of data over a network) and against all other unlawful forms of processing. IMH Ltd will ensure a level of security appropriate to the risk represented by the process and the nature of the personal data to be protected, having all due regard to the state of the art and cost measures. Databases which contain sensitive data will be protected by access passwords. Access passwords will only be issued to the relevant company authorised personnel.

## **Data storage**

Data is held in the United Kingdom using servers or in hard copy. The company does not store personal data outside the EEA.

## **Your rights as a data subject**

At any point whilst IMH Ltd is in possession of or processing your personal data, all data subjects, have the following rights:

- Right to be informed - you have the right to be informed about the collection and use of your personal data
- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.

In the event that IMH Ltd refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

IMH Ltd, at your request, can confirm what information it holds about you and how it is processed.

## **Identification to access personal data held**

IMH Ltd will accept the following forms of ID when information on your personal data is requested: A minimum of one piece of photographic ID and a supporting document is required e.g. driving licence, passport, birth certificate, proof of home address, proof of employing company. If IMH Ltd is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to one of the Data Protection Officer.

## **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by IMH Ltd, you have the right to complain initially to the Company Data Protection Officer. If you do not get a response within 30 days you can complain to the ICO.

The contact details are:

Data Protection Officer, IMH Ltd, 2 Snowdon Road, Middlesbrough, Cleveland, TS2 1LP

Telephone: 01642 802700

ICO Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone 0303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>