

## **Highland Industrial Supplies Ltd- Customer/ Supplier Privacy Notice**

### **WHAT IS THE PURPOSE OF THIS DOCUMENT?**

Highland Industrial Supplies Ltd is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with data protection legislation, including The UK GDPR (The UK General Data Protection Regulation) and Data Protection Act 2018 (amended), and may be amended from time to time.

It applies to all customers and suppliers

Highland Industrial Supplies Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current customers and suppliers. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy policies or privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

**We will collect, store, and use the following categories of personal information about you:**

- Personal contact details such as name, title, addresses, telephone numbers, and personal/ business email addresses.
- Date of birth- (sole trader).
- Bank account details if provided for D/D.
- CCTV footage and other information obtained through electronic means such as credit information.
- If you provide feedback or make a complaint.

### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about customers, either directly from customers or sometimes from credit reference agencies.

### **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/ you have entered into with us/ 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.

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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.

### **Situations in which we will use your personal information**

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract we/ you have entered into with us/ you.
- Business management and planning, including accounting and auditing.
- To prevent fraud.
- To provide a credit reference to a 3<sup>rd</sup> party. (subject to your consent)

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we/ you have entered into with you/ us (such as paying you or providing goods), or we may be prevented from complying with our legal obligations.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We don't envisage collecting sensitive personal data.

### **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### **DATA SHARING**

We may have to share your data with third parties, including (but not limited to) third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

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### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

The following third-party service providers process personal information about you for the following purposes:

ITP- Website support, online account details/ sales history

Beverley Scott- company systems development/ support

Calum Macleod- IT/ Account systems support

Andrew Grey- Debt Recovery

Johnston Carmichael- Company audits

### **How secure is my information with third-party service providers?**

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **When might you share my personal information with third parties?**

We may share your personal information with third parties for the purpose of: administration, IT services, debt recovery & company auditing or to provide a 3<sup>rd</sup> party credit reference.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **DATA RETENTION**

### **How long will you use/hold my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Guidelines which is available from our website.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer/ supplier of the company we will retain and securely destroy your personal information in accordance with our Data Retention Guidelines.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

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It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
- **Request correction** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** Where we are relying on a legitimate interest (or those of a third party) and there is something which makes you want to object to processing on this ground.
- **Request the restriction of processing** This allows you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party when the information is stored and processed automatically.

If you want to exercise any of the above rights, please contact Yvonne Brown, Director in writing.

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our DPO.

## DATA PROTECTION OFFICER/COMPLIANCE MANAGER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.