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## PRIVACY NOTICE

### WHO WE ARE

This Privacy Notice describes how Swindon Asbestos Surveying Ltd collects and uses personal data. It applies to (prospective) customers (including delegates attending training courses) and (potential) stakeholders of SAS.

- References to "us", "we", "our" or "SAS" are to:

SAS Ltd, a company registered in England and Wales (company number 0593002) with a registered address at 70 Southbrook Street, Swindon, SN2 1HG, United Kingdom.

- SAS acts as data controller in respect of your personal data that we process. Our Privacy and Data Compliance Officer is Jayne O'Sullivan. If you have any questions about this Privacy Notice and how we use your personal data, please get in touch with us via the contact details below:

Email: Jayne@swindon-asbestos.co.uk

Telephone: +44 (0) 1793 432090

- This Privacy Notice supersedes any previous Privacy Notice. We may update this Privacy Notice from time to time to ensure that it remains accurate. If we do so, we will provide you with an updated copy of this notice as soon as reasonably possible.
- This Privacy Notice was last updated on 05 November 2020.

### WHAT DATA DO WE COLLECT

The personal data that we collect will depend on your relationship with us. Please see below for detailed information regarding the types of information we collect and use about you.

#### Customers / prospective customers:

- Name, (business) address, job title, email address, telephone number, and (if applicable) employer name.
- Qualifications certificates and number reference which may contain pictures and an individual's date of birth.

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#### Delegates (customers) attending public training courses:

- Name, address, phone numbers, employer name (if applicable).
- National Insurance Numbers for the purpose of providing individual document identification.
- Information about disability, medical conditions, allergies to facilitate course.

#### Stakeholders /potential stakeholders:

- Name, employer, phone numbers, address, email, job title.

### **WHO DO WE COLLECT YOUR DATA FROM**

We collect your personal data:

- Directly from yourself via the information you provide to us.
- From your company / employer.
- Publicly available sources, such as:
  - Social media sites such as LinkedIn, Twitter, and You tube
  - Web searches

### **HOW DO WE COLLECT YOUR DATA**

We collect your personal data:

- Face to face when you meet us.
- Via regular mail (in writing).
- By telephone.
- By email.
- Via website registration.
- Via customer application.
- Via the internet

#### **WHAT ARE THE PURPOSES AND LEGAL GROUNDS FOR USING YOUR DATA**

We collect and use your personal data for several different purposes:

- To prepare a quotation for you regarding the services we offer.
- To provide you with the services as set out in our Standard Terms of Business and our contract with you or as otherwise agreed with you from time to time.
- To deal with any complaints or feedback you may have or are involved with.
- To meet our compliance and regulatory obligations and as required by tax authorities or any competent court or legal authority.
- For marketing to you. Please see the separate section on Marketing below.
- Training and performance monitoring of our staff.
- For the administration and management of our business, including but not limited to organising public training courses, recovering debts and archiving or statistical analysis.
- Seeking advice on our rights and obligations, such as where we require our own legal advice.

For each purpose, we must have a legal ground for such processing. In respect of your personal data, the legal grounds we rely on are:

- Our performance of a contract with you.
- Us having an appropriate business need to use your data, and such need does not overly prejudice you.
- You have given your explicit consent for us to use your personal data.
- Us having a legal or regulatory obligation to use your data; and the necessity to use your data to establish, exercise or defend our legal rights.

#### **WHO DO WE SHARE YOUR DATA WITH**

We may share your personal data with our internal teams / departments via internal reports and via access to central IT systems.

We also disclose your personal data to the third parties listed below:

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- Third parties whom we engage to assist in delivering the services to you, such as IT providers and data storage providers.
- Agents, advisers, intermediaries you advise us to share your data with.
- Our professional advisers where it is necessary for us to obtain advice and assistance, such as lawyers, accountants, auditors.
- Debt collection agencies and credit referencing agencies.
- Relevant accreditation scheme owners, regulatory authorities, or law enforcement agencies, subject to your agreement via a waiver of confidentiality.

### YOUR RIGHTS

Under the GDPR you have certain rights in relation to the personal data that we hold about you. You may exercise these rights at any time by contacting us using the contact details set out further below in this section.

Please note that in some cases we may not be able to comply with your request because of our own obligations to comply with other legal or regulatory requirements.

However, we will always respond to any request you make and if we cannot comply with your request, we will tell you why.

Your rights are:

- The right to access your data

You are entitled to a copy of the personal data we hold about you and certain details of how we use it. Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. Subject to certain circumstances, there will not be a charge for dealing with these requests.

- The right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

- The right to erasure

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In certain circumstances, you have the right to ask us to erase your personal data.

- The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal data.

- The right to data portability

In certain circumstances, you have the right to ask that we transfer any personal data that you have provided to us to another third party of your choice.

- The right to object to marketing

You can ask us to stop sending you marketing communications at any time.

- The right to withdraw consent

For certain uses of your personal data, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal data.

- The right to lodge a complaint with the ICO

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal data by us is in breach of applicable data protection laws and regulations. Making a complaint will not affect any other legal rights or remedies that you have.

### MARKETING

We may also use your personal data to provide you with information about services we provide which may be of interest to you where you have provided your consent for us to do so. This information may include alerts, newsletters and invitations to events or functions. We will communicate this to you in a number of ways including by post, telephone, email or other digital channels.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from marketing communications sent by us, you may do so at any time by contacting us in one of the following ways:

Email: [jayne@swindon-asbestos.co.uk](mailto:jayne@swindon-asbestos.co.uk)

### **WHAT IS OUR APPROACH TO INTERNATIONAL DATA TRANSFERS**

In principal, we do not store or process personal data that we collect about you in countries outside the European Economic Area (EEA). However, some of the third parties we share personal data with (as set out in this Privacy Notice), may be located outside the EEA. In those circumstances, please note that your personal data will only be transferred outside the EEA on one of the following bases:

- the country that we send the personal data to is approved by the European Commission as providing an adequate level of protection for personal data.
- the transfer is to a recipient in the United States of America who has registered under the EU/US Privacy Shield.
- the recipient has entered into European Commission standard contractual clauses with us; or
- you have explicitly consented to such transfer by emailing SAS (jayne@swindon-asbestos.co.uk)

### **HOW LONG DO WE KEEP YOUR DATA**

We will only retain your personal data for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and to comply with our legal and regulatory obligations. Please contact us if you would like further information regarding the periods for which your personal data will be stored.

### **WHAT WE DO TO SAFEGUARD YOUR DATA**

SAS is committed to protecting your privacy. Our staff use mobile devices, such as laptops and mobiles that are encrypted. Where we outsource our Information Technology and Communications infrastructure and business systems, we use providers that are ISO/IEC 27001 compliant. Our staff receive periodic training on data protection and all our contracts with third parties include relevant confidentiality and data protection provisions.

### **COMPLAINTS**

Individuals who wish to make a complaint relating to breaches of the Data Protection Act 2018 and / or complaints that an individual's personal information is not being processed in line with this policy may do so by emailing:

Jayne O'Sullivan, Quality Director,  
Email address: jayne@swindon-asbestos.co.uk

This policy has been endorsed by Jayne O' Sullivan and has the full support of the management team.



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The policy was reviewed and approved on 5 November 2020 following consultation with senior managers and workers.

Overall responsibility for the effectiveness of the policy lies with Jayne O' Sullivan, Quality Director. For more information, please contact this person: 01793 432090

Director	Name	Signature	Date
Quality Director	Jayne O'Sullivan		05.11.20
Removals Director	Eddie O'Sullivan		05.11.20