

CUSTOMER AND SUPPLY CHAIN PRIVACY NOTICE

1. What is the purpose of this document?

Adept Consulting Engineers 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 working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Adept Consulting Engineers 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 privacy notice applies to you if we process your personal information and you are not an employee or worker of ours, a prospective candidate employee or worker or an individual to whom we have provided a specific privacy notice.

You may, for example, be an individual that is a business contact of ours or another organisation that we deal with, an attendee at one of our events or a user of our website. This privacy notice does not form part of any contract you or the organisation you work for may have with us.

References to "we, our or us" in this privacy notice are to Adept Civil and Structural Consulting Engineers Limited.

Details of our main trading entity is as follows: Adept Consulting Engineers Limited is a limited company incorporated in England and Wales. Registered Number: 6029802 Registered Office: 1912 Mill, Sunny Bank Mill, Town Street, Farsley, Leeds, LS28 5UJ

It is important that you read this notice, together with any other privacy notice 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.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Personal contact details** - Name, title, role, addresses, telephone numbers, and email addresses.
- **Information about your use of our information** and communications systems.

- **Photographs** – for example those taken at corporate events for purposes of marketing use on social media platforms.

There are "special categories" of more sensitive personal data which require a higher level of protection.

- We will not collect, store or use any "special categories" of more sensitive personal information.

4. How is your personal information collected?

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you indicate that you are interested in the services we provide, wish to obtain information or attend an event, complete forms we provide to you, use our website/other social media platforms, make a complaint, contact us by phone, email or communicate with us directly in some other way.
- **From referrals and recommendations:** usually given by other people who know you or have a working relationship with you.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website
- **Your website:** Publicly available information about you, your role and your company including contact details.
- **Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.
- **Our professional advisors:** such as lawyers, accountants, surveyors and other consultants and advisors.

5. Situations in which we will use your personal information

We need all the categories of information in the list above (see Section 3) primarily to allow us to perform our contract with you. 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.

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:

- To contact you to discuss business related interests and opportunities.
- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- 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.
- For invoicing purposes, business management and planning, including accounting and auditing.
- Conducting performance reviews, requesting feedback forms for customer satisfaction, managing performance and determining performance requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- To prevent fraud.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Which will apply will depend upon the nature of your relationship and interactions with us.

Purpose	Personal Information Used	Lawful Basis
Enter into and perform contracts, where we may be supplying services to you and/or you may be supplying products/services to us or we may be involved in similar arrangements with third parties.	All the personal information we collect	To enter into and perform contracts with either yourself or the organisation that you represent We have a legitimate interest to properly perform contracts with third parties.
Maintain and improve our services and/or products	All the personal information we collect	We have a legitimate interest to improve the services and/or products we provide/supply or have provided/supplied to us.
Data analytics and statistical analysis to help us improve our online services	How you use our website	We have a legitimate interest to improve the online services we provide and user experience
Managing our relationship with you, dealing with and managing the exchange of contracts and completion of business accounts.	All the personal information we collect	We need this information to be able to enter into, manage and perform our contract with you
To provide you with requested information	Contact details and services and products or other information that you have requested we provide to you or your organisation	To comply with any request made by you
To hold and publicise events in print or on social media platforms	Your contact details, details of attendance, your comments in response forms and photos and/or video.	We have a legitimate interest in holding and publicising events and tracking attendance.
To comply with our legal and regulatory obligations	All the personal information we collect	To comply with any legal and regulatory obligation or requirement
Fraud, crime prevention and debt collection	All the personal information we collect	We have a legitimate interest to detect and prevent crime and to collect debts.
To manage our relationship with you and to operate our business	All the personal information we collect	We have a legitimate interest to operate our business in an efficient way To enter into and perform contracts with either yourself or the organisation that you represent
Storage of records relating to you and also records relating to our business	All the personal information we collect	To be able to manage and fulfil any contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records

5.1 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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data sharing

We may share personal information with the following parties:

- **Other companies in our supply chain:** so that they can contact you about any issues in relation to works or where your personal information is relevant to a sub-contractor or party above us in the supply chain;
- **Third parties who ask for or want referrals:** we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide;
- **Our PR company:** to help us to develop, carry out and assess PR campaigns;
- **Other service providers and advisors to us:** such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our clients, provide us with legal or financial advice and generally help us deliver products and services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent;
- **Information providers:** which may include credit reference agencies, Companies House, HMRC, Land Registry;
- **The Government, local authorities, planning authorities or relevant regulators:** where we are required to do so by law or to assist with their investigations, for example the Information Commissioner's Office; and
- **Police, law enforcement agencies and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We also use Google Analytics which sets cookies to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/qaoptout>.

7. Marketing

- **Email marketing:** from time to time, we may contact existing clients by email with information or news updates about the services we believe you may be interested in.

You can let us know at any time that you do not wish to receive marketing messages by sending an email to your usual contact or info@adeptcsce.com. We do not otherwise contact people for marketing purposes.

8. Transferring information outside the EU

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

Our directors and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they

do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section “Data Sharing” may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

9. Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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.

10. Data retention

How long will you use 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.

We have set out below the main retention periods which will apply:

- For individual contacts with clients and suppliers this will be for as long as we continue to have a relationship with that client or supplier and then for a period of 2 years afterwards;
- For website users it will generally be a period of 1 year after you used our website;
- For individuals seeking information, making complaints or otherwise corresponding with us it will generally be 6 years;
- For individuals attending an event it will generally be a period of 12 months after the event; and
- For financial transaction we would retain your records for approximately 12 years because this is our legal obligation.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

11. Your duty to inform us of changes

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or work for a different organisation or change your phone number or email address. You can contact your usual contact within our organisation or by sending an email to info@adeptsce.com

12. Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. 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** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables 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.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Helen Leech, Office Manager 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.

13. 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 info@adeptsce.com. Once we have received

notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact [Erol Erturan, Managing Director on 0113 239 4518](#)

This Privacy Notice was last updated on 23rd May 2018.