



## **ICAM Engineering Limited**

### **Data Protection**

#### **Privacy Policy**

ICAM Engineering Limited is committed to protecting the privacy of individuals in compliance with the General Data Protection Regulations (25.05.2018) and UK Data Protection legislation. This policy explains how and why we use personal data, the conditions under which we may disclose it to others and how we keep it secure.

This applies to our website and other services provided by us, and all communications with individuals through written or oral means, such as email or telephone.

We may change this Privacy Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. By using our website, you are agreeing to be bound by this policy.

The terms within this Privacy Policy represents your “right to be informed” under the General Data Protection Regulations (GDPR).

#### **About Us**

We are ICAM Engineering Limited registered in England and Wales (Company No. 00827957) with its office at Dock Road, Connah’s Quay, Deeside. We are not required to be listed on the Information Commissioner’s register of data controllers.

ICAM is the ‘data controller’ for the purpose of data protection law. As the ‘data controller’ we are responsible for deciding how we hold and use personal data.

#### **What Information We Collect and Why**

ICAM specialises in the manufacture of high quality stainless steel fabrications to a wide range of industries within and outside the UK. In order to operate our business, we collect identity, contact, financial and transactional data in relation to our customers and suppliers. We also collect personal and sensitive data such as health records relating to our employees.

This personal information includes but is not restricted to first name, last name or similar identifier, date of birth, billing address, email address, telephone numbers, bank account details, and details about transactional financial data relating to payments to and from customers and suppliers.

#### **How We Use Your Information**

We use the personal data that we collect in a variety of ways in operating our business but will only ever use your personal data to the extent necessary to

- Perform a contract with you;
- Comply with a legal duty;
- Undertake our own legitimate business interests provided your rights don't override these.

Information will only be used for the purpose it was collected. We may process your personal data for more than one of the lawful reasons stated above depending on the specific purpose for which we are using your data such as paying our employees or dealing with the HMRC.

We will only disclose information to third parties where it is necessary to perform the contract or to fulfil our legal obligations and we limit the information provided to that which is reasonably necessary. Our relationship with third parties requires them to maintain confidentiality of such information and comply with the standards associated with GDPR and data legislation.

Generally, ICAM does not rely on consent as a legal basis for processing your personal data as we do not use personal data for any direct marketing activities. In the event that this position changes you would be asked to give your prior consent to receiving marketing material. You would have the right to withdraw this consent at any time by contacting the nominated Data Protection Person as detailed below.

### **Security of Your Information**

Keeping your data safe is of paramount importance to us. We have in place a variety of reasonable and appropriate technical and organisational measures to ensure that it is protected from accidental loss, unauthorised access, use or disclosure of it.

In the event of any suspected data security breach this will be immediately investigated and rectified. We will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are legally required to do so.

### **Data Sharing**

ICAM has legal obligations to share personal data with third parties such as HMRC where there are legitimate interests or contractual reasons to do so.

When it is necessary to share your data with another organisation who provide a service to us such as suppliers and banking services they are required by law to take reasonable and appropriate steps to ensure that your personal and sensitive data is secure. We only permit our third party providers to process your personal data for specified purposes and in accordance with our instructions.

We will at all times limit access to your personal data on a strict business need to know basis. We will never share your personal data with a third party who might use it for their own purposes. We will never sell your personal data.

We may have to disclose your data with third parties to whom we may merge, sell or transfer parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. In such circumstances the new business may use your personal data in the same way as set out in this privacy notice.

Information is only shared outside the UK for the purpose of performing a contract with a specific customer. Whenever personal data is transferred out of the European Economic Area (EEA) it is expected that there will be an appropriate and adequate degree of personal data protection.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purpose of satisfying any legal, accounting or reporting requirements. Data will be accurate, kept up to date, relevant and limited to what is necessary. After a contract has ended necessary data will be archived to comply with legal requirements.

Data retention will be reviewed annually, and data will be kept for no longer than necessary.

## **Your Rights**

Under data protection law you have the right to be informed about the processing of your personal data. Also, you have the right to ask to see the information we hold about you and be able to amend it if the information is inaccurate or incomplete. You have the right to request erasure, but this is not an automatic right and only applies where there is no lawful reason for us to continue to process the data. Under certain circumstances you may also have the right to object or restrict processing and transfer your personal data. If you want to exercise any of your rights', please contact our Data Protection Person named below.

It is important that the personal data we hold about you is accurate and current. In the event that your personal information changes please notify us of any relevant changes by contacting ICAM's nominated Data Protection Person as below.

## **Subject Access Request**

If you make a request to access your personal data, this is known as a Subject Access Request (SAR). A request can be made verbally or in writing, but it must be specific and made for data protection purposes. This will be dealt with without undue delay and at the latest within one month.

Provided the request is reasonable no fee will be charged.

We take all necessary steps to ensure that personal information is not disclosed to any person who has no right to receive it. If you make a SAR, we will confirm your identity and ensure your right to access the information or to exercise any of your other rights.

## **Nominated Data Protection Person**

ICAM's Commercial Director is the point of contact for data protection. Any queries or requests for information should be addressed to the Commercial Director at the organisation's address or email [enquiries@icamengineering.co.uk](mailto:enquiries@icamengineering.co.uk).

## **Complaints**

You have the right at any time to make a complaint to the ICO, the UK regulatory for data protection. You can find out more information on the ICO website <https://ico.org.uk/concerns>.

The ICO's contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745

**Last Update**

This Privacy Notices was last updated on 22<sup>nd</sup> May 2018.

**GDPR/May 2018**