

# GDPR POLICY



## PRIVACY POLICY

Sequs Consulting Ltd takes your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share your personal data.

It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

## PERSONAL DATA WE COLLECT ABOUT YOU

- Bank details.
- electronic contact details e.g. names, email address and mobile phone numbers.
- Information relating to the matter in which you are seeking our Consultancy /working with us on.

This personal data is required to enable us to provide our service to you. If you do not provide the personal data we ask for, it may delay or prevent us from providing services to you.

## HOW YOUR PERSONAL DATA IS COLLECTED

We collect most of this information from you and/or your Company direct.

In addition, we may collect information from our information technology systems e.g. email.

## HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have proper reason for doing so, e.g.

- Have a legitimate business reason for contacting you in a marketing capacity.
- For the performance of our contract with you and your Company or to take steps at your request before entering into a contract.
- We use your personal data for and our reasons for doing so are to coordinate information relating to the Contract we are working with you on.
- Any other processing necessary to comply with professional, legal and regulatory obligations that apply to our business.
- Ensuring business policies are adhered to e.g. policies covering security and internet use for our legitimate interests or those of a third party i.e. to make sure we are following our own internal procedures, so we can deliver the best service to you.
- Operational reasons, such as improving efficiency, training and quality control i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
- Preventing unauthorised access and modifications to systems for our legitimate interests or those of a third party i.e. to prevent or detect criminal activity that could be damaging for us and for you, and to comply with our legal and regulatory obligations.

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- Updating and enhancing records for the performance of our contract with you or to take steps at your request before entering into a contract, to comply with our legal and regulatory obligations and for our legitimate interests or those of a third party i.e. making sure that we keep in touch with our clients about existing and new services.
- External audits and quality checks for our legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards and to comply with our legal and regulatory obligations.

## WHO WE SHARE YOUR PERSONAL DATA WITH

We may periodically share your personal data with:

- External service representatives that we use to make our business more efficient e.g. information technology support.
- Client organization where relevant for commissions.
- Emergency services/statutory bodies.
- Professional advisors who we instruct on your behalf or refer to you to e.g. other professional engineering, solicitors or other experts.
- Other third parties where necessary to carry out your instructions e.g. Consultants, Our Insurers and Brokers.
- External auditors.
- Our banks.

We will not share your personal data with anyone else unless you specifically instruct us.

If someone asks for data that is specific to you, we will contact you and ask for permission before sharing it.

## WHERE YOUR PERSONAL DATA IS HELD

Information may be held at our offices, service providers, representatives and agents as described above (see “Who we share your personal data with”).

## HOW WE PROCESS YOUR DATA

We process your data on your behalf and only on your explicit instructions. We will comply with the technical and organisational measures required under Article 17 of the Data Protection Directive, to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access and against all other unlawful forms of processing.

We will maintain the personal data in strict confidence and we will not disclose any personal data supplied to us to any third party without your consent.

We will not make use of any personal data supplied by you or your company employees otherwise than in connection with the provision of services to your Company.

## HOW LONG WILL YOUR PERSONAL DATA BE KEPT?

We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons

- To respond to questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly.

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- To keep records required by law.
- In the event that we may work with you again and require reference to previous contracts and documents.
- To satisfy the requirements of our professional indemnity insurers.

We will not retain your personal data for longer than necessary for the purposes set out in this policy.

Different retention periods apply for different types of data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it. If you wish us to delete any/all of the information we hold for you please contact us and we will conform

## **TRANSFERRING YOUR DATA OUT OF THE EU**

We do not currently transfer your personal data outside the EU

## **YOUR RIGHTS**

You have the following rights which you can exercise free of charge

- Access: the right to be provided with a copy of your personal data (the right of access)
- Rectification: the right to require us to correct any mistakes in your personal data
- To be forgotten: the right to require us to delete your personal data in certain situations
- Restriction of processing: the right to require us to restrict processing of your personal data in certain circumstances e.g. if you contest the accuracy of the personal data
- Data portability: the right to receive the personal data you provided to us in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations
- To object: the right to object at any time to your personal data being processed for direct marketing and in certain other situations to our continued processing of your personal data e.g. processing carried out for the purposes of our legitimate interests

For further information on each of those rights, including the circumstances in which they apply please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- Email, call or write to us
- Let us have enough information to identify you (e.g. your full name, address)
- Let us have proof of your identity and address (e.g. A copy of your passport and either your
- driving licence or a recent utility or bank statement)
- Let us know what right you want to exercise and the information to which your request
- Relates

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## KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully.

We limit access to your personal data to those who have a genuine business need to access it.

Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

Please contact Sequs Consulting Ltd who may be contacted on 07909086728 to discuss your query or concerns.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is the Information Commissioner who may be contacted at <http://ico.org.uk/concerns> or telephone 0303 123 1113

## CHANGES TO THIS PRIVACY POLICY

This privacy policy was published on the 21st May 2018 and last updated on the 31<sup>st</sup> October 2018.

We may change this privacy policy from time to time and when we do we will inform you in writing.

## YOUR AUTHORITY AND AGREEMENT TO OUR POLICY

I authorise you to retain and manage my personal data in accordance with your firm's privacy policy and to retain documents in your secure storage.

We note that we can withdraw our consent at any time:

COMPANY NAME:	
SIGNATORY NAME:	
SIGNATORY POSITION:	
SIGNATURE:	
DATE:	