

Data Protection Privacy Notice

1.0 Introduction

- 1.1 Alfaplas Limited takes its data protection responsibilities very seriously. Processing of personal data shall always be in line with the Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR).
- 1.2 By means of this Privacy Notice we would like to inform the general public why and how we collect and process personal data and Data Subjects' rights relating to the collection and processing of personal data.
- 1.3 The Company is registered as a Data Controller with the Information Commissioners Office (ICO) and can be found on the Data Protection Register under registration number **ZA291546**.

2.0 Definitions

- 2.1 The following are key terms as defined in the GDPR:
 - a) **Data Controller** – person, company or organisation who determines how and why the personal data is processed. Holds responsibility for the data.
 - b) **Data Processor** – acts on the Controllers behalf and is required to maintain records of personal data and processing activities.
 - c) **Data Subject** – Any living individual who is the subject of personal data. Sometimes referred to as a *Natural Person*. An identifiable Data Subject is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that Data Subject.
 - d) **Personal data** – Any information relating to an identified or identifiable Data Subject.
 - e) **Sensitive data** – Special categories of personal data containing information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, sex life or sexual orientation and criminal history of an identified or identifiable Data Subject.

- f) **Recipient** – Any person to whom the data is disclosed in the course of processing to data for a Data Controller (i.e. an employee, Data Processor or employee of a Data Processor).
- g) **Third Party** – Any Natural or Legal Person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorised to process personal data.
- h) **Processing** – Anything done with or to the data such as obtaining, recording or holding (storing) information and carrying out any operation or set of operations upon it, whether or not by automated means, including adaption, alteration, retrieval, consultation, use, disclosure, transfer, erasure or destruction.
- i) **Profiling** – Any form of automated processing of personal data consisting of the use of that data to evaluate certain personal aspects relating to a Natural Person.
- j) **Consent** – Consent of the Data Subject is any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

3.0 Rights of the Data Subject

- 3.1 GDPR affords Data Subjects with rights. These rights are summarised below:
- a) **Informed** – to be informed about the collection and use of their personal data;
 - b) **Access** – to obtain free information about his or her personal data stored at any time and a copy of this information (refer to Section 8);
 - c) **Rectification** – to have inaccurate personal data rectified or completed if it is incomplete;
 - d) **Erasure** – in certain circumstances, an individual can request their personal data be erased. Also known as “*the right to be forgotten*”;
 - e) **Restriction of processing** – to obtain restriction or suppression of processing where a statutory reason applies. Personal data may still be stored but not used;
 - f) **Data portability** – to obtain and reuse personal data for their own purposes by allowing it to be moved, copied or transferred easily across different services in a safe and secure way without affecting its usability;
 - g) **Objection** – to object to the processing of personal data concerning him or her;
 - h) **Automated individual decision making, including profiling** – the right not to be subject to a decision based solely on automated processing, including profiling;

- i) **Withdrawal of consent** – where consent forms the basis for processing, Data Subjects shall have the right to withdraw their consent to the processing of his or her personal data at any time.
- j) **Complaints to Supervisory Authority** – where a Data Subject has exhausted their primary rights, they will also have the right to complain to the lead Supervisory Authority.

3.2 In order to assert any of the above rights the Controller can be contacted at:

Alfaplas Limited
Unit 1 Ramsden Road
Rotherwas Industrial Estate
Hereford
HR2 6LR

Phone: 01432 262615 Email: data.protection@alfaplas.co.uk Website: www.alfaplas.co.uk

4.0 Contact details for the Lead Supervisory Authority

4.1 The Lead Supervisory Authority overseeing the Controller can be contacted at:

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

Phone: 0303 123 1113 Email: casework@ico.org.uk Website: www.ico.org.uk

5.0 Personal data processed by us & our legal basis to do so

5.1 We process data that enables us to provide manufacturing services, promote our goods and services, maintain our accounts and records and to support and manage our staff. We also use a CCTV system to maintain the safety of those on and around our premises, the security of the premises and for preventing and investigating crime.

5.2 We process data, including personal and sensitive personal data about:

- Our Employees;
- Customers and clients;
- Suppliers and service providers;

- Advisers, consultants and other professional experts;
- Complainants and enquirers;
- Individuals captured by CCTV images

5.3 Information and personal data processed by us may include:

- Personal details, including name, address and contact details;
- Financial details, including pension, bank, salary and tax details;
- Education details;
- Employment details;
- Goods & services provided;

5.4 We also process sensitive classes of information that may include:

- Medical and health records;
- Offences and alleged offences;
- Visual images, personal appearance & behaviour through CCTV imaging;
- Criminal proceedings, outcomes and sentence

5.5 We process personal data and sensitive personal data where we have identified one of the following legal bases for doing so;

- ✓ The Data Subject has given consent to the processing for one or more specific purposes;
- ✓ Processing is necessary for the performance of a contract which the Data Subject is a party to or in order for us to take steps to enter into a contract;
- ✓ Processing is necessary for compliance with a legal obligation;
- ✓ Processing is necessary for the purposes of our legitimate interests or those of a third party.

5.6 Where the processing of personal data is based on the legitimate interest of Alfaplas Ltd, it is to carry out our business in favour of the wellbeing of all our employees, shareholders, customers & suppliers.

5.7 We seek to ensure that our collection and processing of personal data is always proportionate to the need or requirement to collect the information and will notify you of any changes to the information we collect.

6.0 Who we share information with

- 6.1 Where necessary or when required, we share the information we process with the individual themselves and also with other organisations. In the event of this occurring we will comply with all relevant aspects of the GDPR.
- 6.2 The types of organisations we may need to share some of the personal information we process with are:
- Employment and recruitment agencies
 - Suppliers and service providers
 - Police forces and security organisations
- 6.3 We may also need to share some personal information with potential purchasers of some or all of our business or during re-structuring. In the event of this happening, all parties will be bound by confidentiality obligations.
- 6.4 CCTV information will be shared, when necessary or required, with the Data Subject, employees, service providers, police forces, security organisations and persons making an enquiry.
- 6.5 Access to personal data will be limited to those who have a genuine business need to access it. Those processing the information will do so only in an authorised manner and are subject to a duty of confidentiality.

7.0 Security, transfers & breaches

- 7.1 As the Controller, Alfaplas Ltd has implemented the appropriate technical and organisational measures to ensure personal data processed remains secure. However absolute security cannot be guaranteed.
- 7.2 As Alfaplas Ltd is part of the Sphere group, data collected may also be used by companies within the group. For more information please contact the Data Controller using the contact details in Section 3.
- 7.3 It will sometimes be necessary to transfer personal information overseas. The information is only shared within the EU and European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the DPA and GDPR.
- 7.4 A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data which has affected the confidentiality, integrity or availability of personal data.
- 7.5 If a Data Subject is concerned that a breach may have taken place, they must inform the Data Controller immediately and not more than 12 hours after discovering the potential breach.

7.6 Details of the suspected breach should be emailed to data.protection@alfaplas.co.uk and contain the following information:

- Name and contact details of reporter;
- Full and accurate details of the incident;
- Date and time of when the breach occurred;
- The nature of the data affected;
- How many individuals are thought to be affected.

8.0 Retention of data

- 8.1 Personal data shall be kept in a form that permits identification of Data Subjects for no longer than is necessary for the legal basis for which it is processed.
- 8.2 Information may be held at our offices including those of our group, service providers and external contractors.
- 8.2 After the expiration of the set period for retention, personal data shall be securely deleted, as long as it is no longer necessary for the fulfilment of a contract, the initiation of a contract or in relation to other legal proceedings.

9.0 Employment & recruitment procedures and the contractual obligation of the Data Subject

- 9.1 The Data Controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. Processing may also be carried out electronically if an applicant submits corresponding application documents by email or by means of a web form on the website to the Controller.
- 9.2 Where the Data Controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements.
- 9.3 Where no employment contract is concluded with the applicant, the application documents shall be automatically erased four months after notification of the refusal decision, provided that no other legitimate interests of the Controller are opposed to the erasure or where the applicant has expressly consented to their personal data being retained for a further period of one year.
- 9.4 The provision of personal data is partly required by law and can also result from contractual provisions. It may be necessary to conclude a contract that the Data Subject provides us with personal data, which subsequently is then processed by us.

For example, the Data Subject is obliged to provide us with personal data when our company signs a contract with him/her. The non-provision of that personal data would have the consequence that the contract with the data subject could not be concluded.

10.0 Automated decision making & profiling

10.1 We do not process personal data for automated decision-making or profiling.

11.0 General

11.1 You may not transfer any of your rights under this privacy notice to any other person. We may transfer our rights under this privacy notice where we reasonably believe your rights will not be affected.

11.2 If any court or other competent authority finds that any provision of this privacy notice (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy notice will remain unaffected.

11.3 Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

11.4 This notice will be governed by and interpreted according to the law of England and Wales. All disputes arising under the notice will be subject to the exclusive jurisdiction of the English and Welsh courts.

12.0 Related policies

12.1 This document should not be read in isolation. The following documents also include specific and supporting information;

- i. The Schedule – Information we collect and hold;
- ii. Privacy Policy;
- iii. Incident Response Policy;
- iv. Sphere Code of Conduct.

12.2 A copy of any of the above documents can be requested from the Controller, free of charge.