

Carstens & Robinson Ltd

Privacy and Data Protection Policy

January 2019

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This Privacy and Data Protection Policy provides you with details of the type of personal data we may collect about you, how we process it and the limited conditions under which we may pass your information to trusted third parties. Please be assured that Carstens & Robinson Ltd does not sell, rent or trade email lists with other companies and businesses for marketing purposes. We hope the following will answer any questions you have but if not, please do get in touch with us.

E: info@simplesensiblesafe.co.uk

T: 0330 111 0914

Explaining the legal basis for processing data

The new law on data protection (i.e. GDPR) highlights several reasons a company may need to gather and process an individual's personal information:

- Consent: where you have given us consent to collect and process your data for one or more specific purpose i.e. you have subscribed to receive email newsletters.
- Contractual obligations: we need your personal data to comply with our contractual obligations with you.
- Legal compliance: we need to process your data to remain compliant with the law i.e. stopping fraudulent activities.
- Legitimate interest: we need to process your data to pursue our legitimate interest which you would expect as part of running a business. This would include accident data reported using our licensed online incident reporting system.

Your rights:

- You have the right to be informed. This document highlights the steps we are taking to be completely transparent in how we use your personal data.
- You have the right to know exactly what information we hold about you and how it is processed.
- You have the right to rectify any of your personal data if it is inaccurate or incomplete.
- You have the right 'to be forgotten'. Your personal data can be deleted or removed without the need for a specific reason as to why you wish to do so.
- You have the right to restrict processing of your personal data.
- You have the right to retain or reuse your personal data for your own purpose.
- You have the right to object to your personal data being used.
- You have the right of automated decision making and profiling, protecting you against potentially damaging decision being made without human intervention.

When do we collect your personal data?

- When you make an enquiry or a purchase for any of our services.
- When you subscribe to our email update services.
- When you register for a training course or event.
- When you request information about a product or service.

What sort of personal data do we collect?

- Identifiable data may include: name, gender, date of birth, billing / delivery address, email address and phone number.
- Financial data may include your bank account and payment card details.
- Communication data may include your preferences in receiving marketing communications from us.
- We do not collect sensitive data about you. These would include race and ethnicity, religious beliefs, sexual orientation, political opinion, health information and criminal record.

How we manage your data

- We ensure that any data we collect is securely stored e.g. on password protected cloud storage services, secure online software, and hard copies are locked in cupboards in secure premises.
- We only use personal data for the purposes of our business and the service we provide to our clients.
- We ensure that any Carstens & Robinson Ltd staff are aware of their responsibilities in relation to privacy and data protection.
- We only hold data for as long as it remains relevant and for the purposes it was originally intended for.
- We will keep data we hold up to date.

Cookies and Google Analytics

You can visit our website without giving away any personal information. Carstens & Robinson Ltd do not analyse any data from your website visits e.g. cookies or Google Analytics.

Cookies are small data files which are placed on your computer or other devices (such as smartphones or 'tablets') as you browse our website. They are used to 'remember' when your computer or device accesses our websites. They are also used to tailor the products and services offered and advertised to you, both on our websites and elsewhere.

How and why do we use your personal data?

We use the data that we collect to send you marketing information and communications, including updates on our services and relevant news relating to our service provision, and to enable the operation of our service provision to you.

Due to the nature of our service provision which includes licensed online tools used by our client's and their customers personal data is stored on these systems. Systems include online incident reporting where injured parties (including minors) details are stored, online school visits management, and e-learning. The systems used by our clients are licensed by Carstens & Robinson Ltd and are held on secure servers managed by the provider. Each provider has appropriate security and privacy policies in place compliant with current legislation. Personal data is accessible by system administrators but only for the purposes of service provision or system support. Clients will only be able to access their own data and no other clients via permission rights and password protection.

We also use business management tools to assist in the running of the business. We do not share this data with any other third party and data is only used to support the administration of the business and our service provision to clients.

How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Who do we share your personal data with?

Carstens & Robinson Ltd will not rent or sell your personally identifiable information to others. We do store personal information in location outside of our control (for example Mail Chimp, Insightly CRM, Info Exchange, Evolve, VideoTile, KashFlow) where we license software for client or business use.

Here's what we expect from these organisations as far as your personally identifiable is concerned:

- They only have access to the data they need to perform a specific task or service.
- We only use trusted partners and work closely with them, ensuring that your privacy is respected and protected.
- If we stop using their services / move on to another provider, your data will be deleted.

Non-identifiable data

We do share non-identifiable data (for example usage data, exit page and URLs, number of clicks etc) with interested third parties to help them understand the usage pattern of our website

For example, we work with the following trusted third-party suppliers:

- IT companies who look after our website and other business systems.
- Email marketing e.g. Mail Chimp who help us with our electronic communications with you.
- Google, Facebook, and Twitter to show you products that might interest you while you're browsing the internet.

What are your rights over your personal data?

You can:

- Request access to information that Carstens & Robinson Ltd has about you, free of charge in most cases.
- Correct any information that Carstens & Robinson Ltd has about you, when information is incorrect, out of date or incomplete.
- Request that we stop using your personal data for direct marketing (there is always an 'unsubscribe' button at the bottom of our marketing emails)

- Delete information that Carstens & Robinson Ltd has about you

To ask for your information, please email info@simplesensiblesafe.co.uk to ask for your information to be amended, please contact us.

Your right to withdraw consent

We respect your privacy rights to change your mind and withdraw consent to use your personal data, at any time. We will action your request as soon as we possibly can.

Where we rely on our legitimate interest

In cases where we are processing your personal data based on our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You may update, correct or delete your data and preferences at any time by accessing your data online or emailing us info@simplesensiblesafe.co.uk

Checking your identity

Before any request for change or deletion is actioned you will be asked for proof of identity. This is to protect the confidentiality of your information.

What if you have a complaint?

You have a right to complain to the Information Commissioner's Officer (ICO), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data. You can find out how to do this by visiting www.ico.org.uk

Changes to this Privacy Notice

We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.

If you have any further questions about Carstens & Robinson Ltd.'s collection and storage of data, please contact us.