



Lloyd Morris Electrical Limited
Electrical Engineers and Contractors

LMEPOL 205

Unit 4 Blackwood Business Park,
Ash Road South,
Wrexham
LL13 9UG

Privacy (GDPR) Policy

Policy Statement

Lloyd Morris Electrical respect people's privacy and are committed to protecting the reader/users' personal data. This privacy policy will inform the reader as to how the company looks after their personal data and tells them about the reader/users' privacy rights and how the law protects them.

Purpose

This privacy notice aims to give the reader information on how the company collects and processes their personal data through their use of the company's website, including any data that may be provided through the company's website when they sign up to our newsletter or purchase a product or service.

Scope

This policy applies to all employee regardless of status.

Controller

Lloyd Morris Electrical is the controller and responsible for the reader/users' personal data (collectively referred to as, "The company" in this privacy notice). The company have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this privacy notice. If the reader/user has any questions about this privacy notice, including any requests to exercise the reader/users' legal rights, please contact the manager using the details set out below.

Contact details.

Our full details are:

Full name of legal entity: **Lloyd Morris Electrical**

Email Address: datacompliance@lloydmorris.co.uk

Postal Address: **Unit 4 Blackwood Business Park, Ash Road South, Wrexham LL13 9UG**

Should the reader/user have the right to make a complaint at any time to the Information Commissioners Office, the UK supervisory authority for data protection issues (www.ico.org.uk). The company would, however, appreciate the chance to deal with the concern before the reader/user approaches the ICO so please contact the company in the first instance.

Changes to the privacy notice and the reader/user's duty to inform the company of changes.

This version was last updated on January 2024 and is revised annually with all organisational policies.

The data protection law in the UK was changed on 25 May 2018.

It is important that the personal data the company hold about the reader/user is accurate and current. Please keep the company informed if any personal data changes during the relationship with Lloyd Morris Electrical.

The data the company collects about the reader/user.

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).

The company may collect, use, store and transfer different kinds of personal data about the reader/user who the company have grouped together follows:

- Identity Data includes first name and last name.
- Contact Data includes telephone number (including mobile), address and email address.
- Financial Data includes bank account (Suppliers only for BACS Payments)
- Transaction Data includes details about payments to and from the reader/user



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The company do not collect any Special Categories of Personal Data about the reader/user (this includes details about the reader/users race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about the reader/user's health and genetic and biometric data). Nor do the company collect any information about criminal convictions and offences.

How is the reader/users' personal data collected?

The company use different methods to collect data from and about the reader/user including through.

Direct interactions. The reader/user may give the company the reader/users Identity, Contact and Financial Data by filling in forms or by corresponding with the company by post, phone, email or otherwise. This includes personal data the reader/user provide when the reader/user:

- applies for our products or services; subscribe to our service or publications; or request marketing to be sent to the reader/user.
- Third parties or publicly available sources. The company may receive personal data about the reader/user from various third parties such as our clients or framework customers.

How The company use the reader/users' personal data

The company will only use the reader/users' personal data when the law allows the company to. Most commonly, the company will use the reader/users' personal data in the following circumstances:

Where the company need to perform the contract, the company are about to enter or have entered into with the reader/user. Where it is necessary for our legitimate interests and the reader/users interests and fundamental rights do not override those interests.

Where the company need to comply with a legal or regulatory obligation.

Generally, the company do not rely on consent as a legal basis for processing the reader/users' personal data other than in relation to sending third party direct marketing communications to the reader/user via email or text message. The reader/user have the right to withdraw consent to marketing at any time by contacting the company.

- Purposes for which the company will use the reader/users' personal data.
- To register the reader/user as a new customer or supplier
- Type of Data – Identity & Contact.
- Lawful Basis – Performance of a contract with the reader/user.
- To process and deliver the reader/users order including, a) Manage payments, fees and charges and b) collect and recover money owed to the company.
- Type of Data – Identity, Contact & Financial.
- Lawful Basis - Performance of a contract with the reader/user and necessary to our legitimate interests (to recover debts due)
- To send emails to the reader/user regarding services or events
- Type of Data – Identity & Contact
- Lawful Basis - necessary to our legitimate interests to develop our relationships, products, and services.

Cookies

The reader/user can set the reader/users browser to refuse all or some browser cookies, or to alert the reader/user when the companies websites set or access cookies. If the reader/user disables or refuses cookies, please note that some parts of this the company's website may become inaccessible or not function properly.

Change of purpose.

The company will only use the reader/users' personal data for the purposes for which the company collected it, unless the company reasonably consider that the company need to use it for another reason and that reason is compatible



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with the original purpose. If the reader/user wishes to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the company.

If the company needs to use the reader/users' personal data for an unrelated purpose, the company will notify the reader/user and the company will explain the legal basis which allows the company to do so.

Please note that the company may process the reader/users' personal data without the reader/user's knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of the reader/users' personal data

The company will not share the reader/users' personal data with external third parties unless the reader/user gives consent.

The company will not sell the reader/users personal data to external third parties under any circumstance.

The company may share personal data between grouped companies or parts of our business or our assets.

Alternatively, the company may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use the reader/users' personal data in the same way as set out in this privacy notice.

Data security

The company have put in place appropriate security measures to prevent the reader/users' personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, the company limit access to the reader/users' personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the reader/users' personal data on our instructions, and they are subject to a duty of confidentiality.

The company have put in place procedures to deal with any suspected personal data breach and will notify the reader/user and any applicable regulator of a breach where the company are legally required to do so.

Data retention. How long will the company keep my personal data for?

The company will only retain the reader/users' personal data for as long as necessary to fulfil the purposes the company collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Generally, this equates to 7 no. years.

To determine the appropriate retention period for personal data, the company consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the reader/users' personal data, the purposes for which the company process the reader/users' personal data and whether the company can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances the reader/user can ask the company to delete the reader/users' data, please contact the company if the reader/user wishes the company to delete the reader/users' data.

The reader/users' legal rights

Under certain circumstances, the reader/user have rights under data protection laws in relation to the reader/users' personal data.

- Request access to the reader/users' personal data.
- Request correction of the reader/users' personal data.
- Request erasure of the reader/users' personal data.



- Object to processing of the reader/users' personal data.
- Request restriction of processing the reader/users' personal data.
- Request transfer of the reader/users' personal data.
- Right to withdraw consent

If the reader/user wishes to exercise any of the rights set out above, please contact the data protection manager.

What The company may need from the reader/user

The company may need to request specific information from the reader/user to help the company confirm the reader/user's identity and ensure the reader/users right to access the reader/users' personal data (or to exercise any of the reader/users' other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. The company may also contact the reader/user to ask the reader/user for further information in relation to the reader/users request to speed up the company's response.

The reader/user has the right to:

- Request access to the reader/users' personal data (commonly known as a "data subject access request"). This enables the reader/user to receive a copy of the personal data the company hold about the reader/user and to check that the company are lawfully processing it.
- Request correction of the personal data that the company hold about the reader/user. This enables the reader/user to have any incomplete or inaccurate data the company hold about the reader/user corrected, though the company may need to verify the accuracy of the new data the reader/user provides.
- Request erasure of the reader/users' personal data. This enables the reader/user to ask the company to delete or remove personal data where there is no good reason for the company continuing to process it. The reader/user also has the right to ask the company to delete or remove the reader/users' personal data where the reader/user have successfully exercised the reader/users right to object to processing (see below), where the company may have processed the reader/user's information unlawfully or where the company are required to erase the reader/users' personal data to comply with local law. Note, however, that the company may not always be able to comply with the reader/users request of erasure for specific legal reasons which will be notified to the reader/user, if applicable, at the time of the reader/user's request.
- Object to processing of the reader/users' personal data where the company are relying on a legitimate interest (or those of a third party) and there is something about the reader/user's particular situation which makes the reader/user want to object to processing on this ground as the reader/user feel it impacts on the reader/users' fundamental rights and freedoms. The reader/user also has the right to object where the company are processing the reader/users' personal data for direct marketing purposes. The company may demonstrate that the company have compelling legitimate grounds to process the reader/user's information which overrides the reader/users' rights and freedoms.
- Request restriction of processing of the reader/users' personal data. This enables the reader/user to ask the company to suspend the processing of the reader/users personal data in the following scenarios: (a) if the reader/user wants the company to establish the data's accuracy; (b) where the company's use of the data is unlawful but the reader/user does not want the company to erase it; (c) where the reader/user needs the company to hold the data even if the company no longer require it as the reader/user needs it to establish, exercise or defend legal claims; or (d) the reader/user has objected to the company's use of the reader/users data but the company need to verify whether the company have overriding legitimate grounds to use it.
- Request the transfer of the reader/users' personal data to the reader/user or to a third party. The company will provide to the reader/user, or a third party the reader/user have chosen, the reader/users personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which the reader/user initially provided consent for the company to use or where the company used the information to perform a contract with the reader/user.



- Withdraw consent at any time where the company are relying on consent to process the reader/users' personal data. However, this will not affect the lawfulness of any processing carried out before the reader/user withdraw the reader/user's consent. If the reader/user withdraw the reader/user's consent, the company may not be able to provide certain products or services to the reader/user. The company will advise the reader/user if this is the case at the time the reader/user withdraw the reader/user's consent.

Glossary

Lawful basis

Legitimate Interest means the interest of the business in conducting and managing the business to enable the company to give the reader/user the best service/product and the best and most secure experience. The company makes sure the company consider and balance any potential impact on the reader/user (both positive and negative) and the reader/users rights before the company process the reader/users' personal data for our legitimate interests. The company do not use the reader/users' personal data for activities where the company interests are overridden by the impact on the reader/user (unless the company have the reader/users consent or are otherwise required or permitted to by law). The reader/user can obtain further information about how the company assess our legitimate interests against any potential impact on the reader/user in respect of specific activities by contacting Lloyd Morris Electrical.

Performance of Contract means processing the reader/users' data where it is necessary for the performance of a contract to which the reader/user are a party or to take steps at the reader/users request before entering such a contract.

Comply with a legal or regulatory obligation means processing the reader/users' personal data where it is necessary for compliance with a legal or regulatory obligation that the company are subject to.

External Third Parties

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Principles of Data Protection

The General Data Protection Regulation Act 2018 is based on eight principles stating that data must be:

- Fairly and lawfully processed.
- Processed for purposes.
- Adequate, relevant, and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subjects' rights.
- Secure
- Not transferred to other countries without adequate protection

How does it affect me?

Regulatory fines for non-compliance with the EU's GDPR (General Data Protection Regulation) are much higher than under the UK's DPA 1998 (Data Protection Act 1998) which preceded it. In contrast with the DPA 98's maximum fine of £500,000, the GDPR introduced "effective, proportionate and dissuasive" administrative fines of up to 4% of annual global turnover or €20 million – whichever is greater.

Employees can also be prosecuted for unlawful action under the legislation. Fines could result if the reader/user use or disclose information about other people without their consent or authorisation. The reader/user could even be committing an offence if the reader/user gives information to another employee who does not need the details to carry out their legitimate duties. The reader/user should take particular care when using the Internet, e-mail, and the internal



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network. Special care must be taken with sensitive data such as ethnic origins, religious/political beliefs, health data, disabilities, details of offences or alleged offences, sexual life, or trade union membership.

Individual Responsibilities

All staff have a duty to observe the Principles of the Act. Individuals who do not handle data as part of their normal work have a responsibility to ensure that any personal data they see or hear goes no further. This includes personal data and information extracted from such data, thus, for example, unauthorised disclosure of data might occur by passing information over the telephone, communicating information contained on a computer print-out or even inadvertently by reading a computer screen.

General Guidelines

- Do not leave people's information on desks when it is not in use,
- Lock all filing cabinets,
- Do not leave data displayed on screen, do not leave computers logged on and unattended,
- Do not give out passwords to anyone under any circumstances,
- Do not choose a password that is easy to guess,
- Never send anything by e-mail that the reader/user would not put on the back of a postcard.

Communication

The policies, and with them the objectives are communicated internally and externally to personnel, customers and interested parties through the issuing of the employee handbook, completion of supplier questionnaires, and through the displaying of policies on noticeboards and the organisations website.

Statement of objective framework:

The policies are reviewed annually to ensure new issues or requirements are addressed and actioned based on current legislation and statutory guidance.

Signed:

Ross Hill, Managing Director

Date: January 2024

To be reviewed: January 2025