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# Privacy Policy

We value and are committed to protecting your privacy. This privacy notice describes how and why we collect, store and use the personal data of our customers, suppliers, agents, contractors or employees in the course of our business relationships. Your use of the website indicates your acceptance of this policy. If you have any queries relating to this policy, please email.

In relation to personal data which is processed by Johnson’s Glazing Contractors Limited (“the Company”, “we”, “us” or “our”) in the course of our business relationships, the data controller will be the relevant by Johnson’s Glazing Contractors Limited company which you or your organisation has contracted with or is taking steps to contract with.

## PURPOSES AND LEGAL BASES FOR THE PROCESSING OF YOUR PERSONAL DATA

In order to develop and manage our business relationships with customers, suppliers, agents, contractors or employees, we will process the personal data of individuals who use, who are employed by or who represent those organisations (“your organisation”) for the following purposes:

* To identify, evaluate and select your organisation as a customer or supplier to our business.
* To enable us to maintain a supplier database and effectively manage our supply chain.
* To communicate with you or your organisation regarding commercial opportunities with our business.
* In relation to commercial opportunities that Johnson’s Glazing Contractors Limited may wish to pursue with your organisation.
* In connection with the delivery of products or services by Johnson’s Glazing Contractors Limited to your organisation.
* In connection with the delivery of products or services by your organisation to Johnson’s Glazing Contractors Limited.
* To manage and administer work orders, assignments, purchase orders, invoices or other general administration which is necessary to manage our business relationship with you, your organisation or a third-party.
* Collating information which is necessary in relation to audits, enquiries, accreditations or investigations by public authorities or regulatory bodies.
* To enable us to comply with professional, legal or regulatory obligations which we are subject to (e.g. anti-corruption, tax and accounting, health and safety).
* Preventing and detecting crime against us or your organisation.

To the extent that we process personal data for the above purposes, we rely upon the following lawful bases for processing as set out in data protection legislation.

Consent – In certain limited situations we may process your personal data or special category personal data using your express consent. If you have given us your consent to process your personal data, you may withdraw that consent at any time.

Performance Of A Contract – If you (as an individual) purchase products or services from us, or if we purchase goods or services from you (as an individual), we may use your personal data to facilitate all aspects of that transaction and to enable us to fulfil our contractual obligations to you.

Legitimate Interests – We may process your personal data where it is necessary to pursue our legitimate interests or for the legitimate interests of a third party.

Legal Obligation – In certain limited situations we may be required by law to share your personal data with public authorities or other third parties.

## CATEGORIES OF PERSONAL DATA

To achieve the above purposes, we may process the following categories of personal data:

* Name
* Job title
* Email address and/or telephone number
* Name of your organisation
* Work location(s)
* Personal data which are necessary for signing documents (e.g. signature, certificates, and authorisations).
* Personal data which are necessary for supplier prequalification, tendering or supplier onboarding (e.g. staff qualifications).
* Information from our IT systems (e.g. signing in registers or building access systems.
* Information processed via our CCTV systems (where applicable).
* Information obtained via our corporate communication systems (e.g. email).
* Date of birth (where applicable).
* Photograph (where applicable).

We will collect most of this personal data directly from you, however, in certain circumstances we may also collect information from publicly available sources (e.g. Companies House records or social media).

## WEBSITE FORMS

When you complete a form on our website, we will collect the data that is submitted. Your data will be securely stored and may be used to:

* Prepopulate subsequent website forms.
* Customise your website experience.
* Profile you based upon your usage of the website.
* When you complete a form (e.g. a contact form) we may use the data supplied to send you relevant marketing emails.

Your IP address will be recorded when you use our website. We may use 3rd party IP databases to identify the company you are working for when accessing the website.

This technology does not identify individuals, unless:

* You are a sole proprietor.
* You complete a website form, which allows us to match your IP address with your contact details.

## RECIPIENTS OF YOUR PERSONAL DATA

We treat the personal data of our customers, suppliers, agents, contractors and employees confidentially and in accordance with the applicable data protection laws.

We reserve the right to share your personal data within the Company to the extent that this is necessary to fulfil the above-mentioned purposes.

We may also share your personal data with our customers, suppliers, agents, contractors or employees where it is in our legitimate interests to do so.

In certain circumstances, we may be required to share your personal data with public authorities or other third parties where we are under a legal obligation to do so.

## TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

The majority of the personal data which we handle is stored and processed in the UK or the EU/EEA.

If it is necessary to transfer your personal data to a country or territory outside the UK or the EU/EEA, those transfers will only be made if:

* The country or territory is deemed to have an adequate level of protection for your personal data as set out in data protection legislation.
* If the country or territory is not deemed to have an adequate level of protection for your personal data, Johnson’s Glazing Contractors Limited will provide appropriate safeguards as required by relevant data protection legislation.

## RETENTION OF YOUR PERSONAL DATA

We will retain your personal data for as long as is necessary to achieve the purposes set out above, and in accordance with our corporate data retention schedule. Where a deletion has been requested, we will provide confirmation that your data has been removed from our internal systems. Please note we may not be able to delete anonymous data.

## YOUR RIGHTS

You have extensive statutory rights regarding the manner in which your personal data is processed by us. These rights are summarised below:

* The right to be informed.
* The right of access.
* The right for any inaccuracies to be corrected (rectification).
* The right to have information deleted (erasure).
* The right to restrict the processing of the data.
* The right to portability.
* The right to object to the inclusion of any information.
* The right to regulate any automated decision-making and profiling of personal data.

If you have given us your consent to process your personal data, you may withdraw that consent at any time.

Personal data provided by users of our website will not be subject to automated decision making.

## COMPLAINS

If you are not satisfied with the manner in which we deal with your request, or if you wish to lodge a complaint about the manner in which we have processed your personal data, please contact our Data Protection Officer (information below) or you may contact the relevant Supervisory Authority.

The supervisory authority in the UK is the Information Commissioner (<https://ico.org.uk/>).

## DATA PROTECTION COMPLIANCE OFFICER DETAILS

Rebecca Mehmet is the Company’s appointed Compliance Officer in respect of its data protection activities. She can be contacted at email address [rebecca.mehmet@johnsonsglazing.co.uk](mailto:rebecca.mehmet@johnsonsglazing.co.uk).

## DATA CONTROLLER DETAILS

Sam Phillips is the Company’s appointed Data Controller. She can be contacted at email address [sam.phillips@johnsonsglazing.co.uk](mailto:sam.phillips@johnsonsglazing.co.uk).

## POLICY STATUS

This policy is not part of the contract of employment and the Company may amend it at any time. However, it is a condition of employment that all employees and other who process personal data will adhere to this policy. Any breach of this policy will result in disciplinary action being taken.

## IMPLEMENTATION OF POLICY

This Policy shall be deemed effective as of 25th March 2024. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Michael Johnson

Position: Managing Director

Date: 25.03.2024

Signature:

