



DATA PROTECTION PRIVACY NOTICE FOR EXTERNAL
THIRD PARTIES (NON-EMPLOYEES)

1. What is the purpose of this document?

Barfoots is committed to protecting the privacy and security of your personal information.

This privacy notice describes and informs you of what personal data (information) we hold about you, how we collect it, and how we use and may share information about you when you contact us or enter into an agreement with us in accordance with the General Data Protection Regulation (GDPR). We are required by law to notify you of the information contained within this notice.

Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time and when we collect or process personal information about you in order that you are aware of how and why we are using your personal information.

This notice applies to all external third parties with whom we have dealings with, who are not employees, workers or contractors, but does not form part of any contract to provide services. We may update this notice at any time.

2. Who collects the information

Barfoots is a 'data controller' and gathers and uses certain information about you. As a data controller, we are also responsible for deciding how we hold and use personal information about you.

3. Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy and which confirm that all personal information we hold about you must be:

1. used lawfully, fairly and in a transparent way;
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. relevant to the purposes we have told you about and limited only to those purposes;
4. accurate and kept up to date;
5. kept only as long as necessary for the purposes we have told you about; and
6. kept securely.

4. The kind of information we hold about you

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.

There are 'special categories' of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Your name, contact details (i.e. title, telephone numbers and email addresses)

5. How we collect the information

We collect personal information about any external third parties we have dealings with whenever they contact us.

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We may sometimes collect additional information from other third parties including door entry systems, swipe card systems, automated monitoring of our website and other technical systems, telephones and voicemail.

6. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- a) where we need to perform the contract we have entered into with you;
- b) where we need to comply with a legal obligation; and
- c) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:-

- d) where we need to protect your interests (or someone else's interests); and
- e) where it is needed in the public interest or for official purposes.

We need all the categories of information in the list outlined within section 4 above primarily to allow us to perform any contract we may have with you and to enable us to comply with legal obligations. In some cases we may use your personal information for other permitted reasons, outlined in the list above. The situations in which we will process your personal information are listed below. We have indicated by letters (see key above) the purpose or purposes for which we are processing or will process your personal information:

- To register you as a new client. (a) and (b)
- To manage our relationship with you (which may include notifying you about changes to our terms or privacy policy). (a), (b) and (c)
- Administering any contract we may have entered into with you. (a) and (b)
- Business management and planning, including accounting and auditing. (b) and (c)
- Making arrangements for the termination of our working relationship.(b) and (c)
- Dealing with legal disputes involving you, or other third parties. (b) and (c)
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution. (b) and (c)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Further information on the monitoring we undertake in the workplace and how we do this is available from HR Manager, acting as GDPR Officer.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

7. How we use particularly sensitive personal information

'Special categories' of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

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- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations and in line with our data protection policy;
- where it is needed in the public interest in line with our data protection policy; and

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about external third parties or former external third parties we have had dealings with in the course of legitimate business activities with the appropriate safeguards.

8. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making

9. How we may share the information

We may also need to share some of the above categories of personal information with other third parties, such as external contractors or our professional advisers. We may also be required to share some personal information with our regulators or as required to comply with the law. All third-party service providers and other entities with whom we share data are required to take appropriate security measures to protect your personal information in line with our policies and is bound by confidentiality obligations. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We require third parties to respect the security of your data and to treat it in accordance with the law.

10. Where information may be held

Information may be held on our grounds, and by clients, third party agencies, service providers, representatives and agents as described above.

11. How long we keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, included the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the HR Manager, acting as GDPR Officer. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you no longer have dealings with us we will retain and securely destroy your personal information in accordance with our data retention policy.

12. Your rights to correct, restrict and access your information and to ask for it to be erased.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

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Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact HR Manager, acting as GDPR Officer, in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [POSITION]. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

13. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal information to those who have a genuine business need to know it. Those

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

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

14. How to complain

We hope that the HR Manager, acting as GDPR Officer, can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

15. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

16. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

17. Change of purpose.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you have any questions about this privacy notice, please contact the HR Manager, acting as GDPR Officer on 01243 268811 or by post to Barfoots of Botley Ltd, Sefter Farm, Pagham Road, Bognor Regis, West Sussex, PO21 3PX

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