

# Privacy Policy

This privacy notice describes what information Butterworth Laboratories Limited collect, how we collect and use that information, and what rights you have to access, update, and control it. Any changes we make to our policy will always be reflected on this page; we always notify our customers of any major alterations to the policy, however we recommend that you check periodically to ensure that you are happy with any changes.

This policy is effective from 25<sup>th</sup> May 2018.

Butterworth is committed to ensuring that your privacy is protected. Should we ask you to provide information from which you can be identified, you can be assured that it will only be used in accordance with this policy.

## What we collect

We may collect the following personal information:

- Name
- Job title
- Company they represent
- Contact information (email address, telephone number)
- Site and/or place of work

## How we collect Information

We collect personal information provided directly by you via:

- Our website contact forms
- Communications such as email, telephone and letters
- Surveys and downloads of our literature via third parties
- Communications relating to requested, current and completed services either contracted by or to you
- Exchanges of contact details such as business cards
- In-house security systems
- Contracts and agreements we have with you or are in the process of agreeing with you

## How we use the information we collect and the legal basis for such use

We set out below the uses for which we hold the information which we collect. The legal basis for such uses are identified as follows:

- To allow us to perform our contract with you
- To enable us to comply with legal obligations
- To pursue legitimate interests of our own, or those of third parties, provided your interests and fundamental rights do not override those interests

For business purposes:

- To allow us to provide our services to you (1)
- To allow us to use your services (1)
- To allow us to respond to your enquiries about our services (1, 3)
- To allow us make enquiries about your services (1, 2)
- To enable us to communicate and send documentation relating to contracted work to the correct individuals (1)
- To enable us to charge or pay any fees relating to services supplied (1)
- To enable us to fulfil our regulatory and quality requirements (1, 2)

To fulfil our legal obligations:

- To comply with our regulatory and compliance requirements (2)
- To ensure that we comply with any contractual obligations (1)
- To maintain appropriate business records to comply with any requests required by law (1, 2)
- To demonstrate adequate site security and traceability of visitors entering our premises (1).

For Marketing Purposes:

- To enable us to keep our clients up-to-date with changes and news about our services. Existing clients may decide to not receive marketing communications by unsubscribing from our newsletter. (3)
- To enable us to market and promote our services to parties who are not current clients and who have requested this information. (3)

## Retention Policy

We will hold client records linked to completed contracts for 25 years in accordance with our archiving policy which has been produced to meet the regulatory requirements of our clients.

Contact details for clients, suppliers and other 3<sup>rd</sup> parties will be held for as long as we continue to have a business relationship with those parties or until the details are no longer current. After this time the information will be held for 7 years before it is deleted.

Personal information held for marketing purposes only will be retained where consent has been given and will be deleted once that consent has been removed.

## Who do we share you data with?

We only share personal data in accordance with this privacy notice. Other than information shared with Third Parties, in accordance with "Third Party Transfer"- below, we only share personal data among Butterworth Laboratories personnel.

## Third Party Transfer

For the uses detailed above we may transfer personal information to carefully selected third parties who provide marketing, survey and project management services. They only process information for us under our direction. Prior to any transfer or processing, we confirm that they will handle the information in accordance with 'The General Data Protection Regulation' (GDPR) (EU) 2016/679 as regulated by the Information Commissioners Office (ICO) or afford comparable protections, such as being a member of the Privacy Shield Program.

We will only transfer your personal information to third parties outside of those detailed above in order to comply with our regulatory or legal requirements.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place procedures to safeguard and secure the information we hold. Details of these measures are available on request using the contact details below.

Should we become aware of a security breach likely to result in a high risk of adversely affecting your rights and freedoms we will notify you within 72 hours.

## Controlling your personal information

In accordance with the provision of 'The General Data Protection Regulation' (GDPR) (EU) 2016/679, you have the following rights:

**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.

**Automated decision making** - we will not subject you to automated decision making in relation to your personal data.

Right of access is free of charge however, a 'reasonable fee' will be charged if a request is manifestly unfounded, excessive or repetitive.

We reserve the right to hold personal data for regulatory or legal purposes related to previously executed services.

For further detail on your individual rights listed above, please visit the ICO website. You also have the right to lodge a complaint or concern about our handling of your personal data with the ICO.

You can exercise your rights at any time, verbally or in writing, using the contact details below.

## External links on our website

Our website contains links to other websites of interest. However, once you have used these links to leave our site we cannot be responsible for the protection and privacy of any information you provide whilst visiting such sites not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

## How to contact us

Butterworth Laboratories has a Data Protection Officer who is responsible for our compliance with data protection law. If you have any questions about this policy, please contact us at [datacontroller@butterworth-labs.co.uk](mailto:datacontroller@butterworth-labs.co.uk) or call us on +44 (0)20 8977 0750.

Written enquiries can be sent to:

Butterworth Laboratories Ltd.

54-56 Waldegrave Road

Teddington

Middlesex

TW11 8NY

UK