

This privacy notice explains the processing of personal data of named contacts for companies supplying goods or services to Assurity Consulting Ltd (including the entity of Assurity Consulting Holdings Ltd). This also includes contacts for prospective suppliers and also for former suppliers.

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Why do we process your personal data?

Assurity Consulting Ltd needs to collect and process information about you (personal data) as a named contact for a company supplying goods and services, or for a prospective supplier or a former supplier:

- asking for and obtaining quotations for the supply of goods and services;
- obtaining company references or company credit checks (not personal);
- setting up the supplier contract to provide goods or services;
- paying our supplier invoices;
- providing HMRC and other government agencies information required by law;
- providing a 7 year history of payments to suppliers to meet internal and government auditing requirements;
- making or defending insurance claims or court cases relating to personal injury, liability or professional indemnity;

What are the principles we apply when processing your personal data?

As a responsible business we apply and are able to demonstrate compliance with the following principles for the control and processing of personal data relating to you as a named contact for a company supplying goods and services, or for a prospective supplier or a former supplier:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- processed in a way that is adequate, relevant and limited to what is necessary;
- maintained to ensure it is accurate and where necessary kept up to date; every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We take reasonable steps to ensure that third parties who process data on our behalf also apply and are able to demonstrate compliance with the above principles.

What types of data do we process?

The following list is not exhaustive, but will give you an idea of the kinds of data we may process relating to you. This list will be reviewed regularly as part of the review of this privacy notice to make sure it is as complete as possible:

Your name
Your salutation
Your gender
Your job title
Your company email address
Your company contact postal address
Company phone number
Company mobile phone number
Contract agreements and letters
Invoices, credit notes, statements of account
Emails that you send or receive or are copied or blind copied into
Supplier questionnaires and supplier performance records
Notes of meetings held between representatives of the Supplier and Assurity Consulting Ltd

What lawful bases do we have for processing your data?

For prospective suppliers the act of you responding to requests for quotations or details pertaining to the products and services you may be able to supply, is implied consent for us to process your data purely for the purposes of sourcing suppliers of the goods and services we require. If you are not successful in securing an order with us we will keep your details in order to demonstrate to auditors that we have procured goods and services responsibly and where necessary explored different options for supply.

For suppliers we process your data to perform the contract of supply between your company and us. Some processing of data is directly related to performing our contract, as well as to meet legal obligations such as being able to show a history of payments made for goods and services to HMRC, our auditors or other authorities.

For former suppliers we may need to process your data to perform duties in closing the contract of employment, such as notifying benefit providers that you no longer work for us. Some processing will be necessary to meet legal obligations such as retention of tax and pay records. Much of the longer term retention of data will be on the grounds of legitimate interests to defend legal and insurance claims, both on behalf of us and our suppliers and customers.

How long will we retain your personal data?

N.B. Where there is an outstanding dispute, court proceedings, legal claim, insurance claim, or similar we will extend the retention periods stated below of data relevant to the case until the case is closed and the window of opportunity to appeal any decision is considered to be closed.

Prospective suppliers: We will keep your data for the duration of the procurement campaign. If you are unsuccessful in securing a contract for supply, we may keep the quotations supplied (in written or email format etc.) for up to 7 years so that we can demonstrate to auditors that we have procured goods and services responsibly and where necessary explored different options for supply.

Other documents and records not related to relevant quotations etc. that contain your personal data will be deleted within 2 years. Company specific data of potential suppliers that does not contain personal info may be retained indefinitely (e.g. Company Name, Company 'info' email, company address and company switchboard telephone numbers).

Current suppliers: We will keep relevant data throughout the duration of your contract of supply. You have a duty to inform us of changes, such as changes to your address or other contact details, and we will ensure that we keep your records up to date based on the updates you have provided.

Former suppliers:

To maintain sufficient records for tax audits etc. we will keep records of contracts, invoices and payments for up to 7 years after you cease to supply us with goods and services. These documents will often contain your personal data as a contact for your company.

Data back-ups.

To protect our business interests we undertake secure back-ups of our data. As these back-ups are formed of disc images it is not realistic for us to delete or search for individual data items in these back-ups. However, we limit our back up retention to 6 months so within 7 months after the retention guidelines given above, the data will also have been removed from our back-up systems.

Who is the data controller and who processes your data?

Assurity Consulting Limited is the data controller.

We have our own in house purchasing and finance functions and so we also process much of the required personal data for the purposes of maintaining our contracts of supply of goods and services.

However, there are third parties that we need to send your data to and from for processing, these include but are not limited to:

- Bank – for payment of invoices.

- Inland Revenue, Companies House, and other government and pseudo government agencies – to meet legal requirements we need to provide details about your contract to supply services.
- Accountancy firm – as part of our annual audit they need access to supplier contracts, supplier questionnaires, invoices, and payment records etc. to make sure we are meeting legal and best practice standards.
- Commercial lawyers and interested parties – where there is a possible or actual dispute, or where due diligence is required relating to supply contracts or bad debt supplier data will need to be shared with our lawyers and where relevant the lawyers of the interested party and the interested party themselves.
- Commercial insurers and commercial insurance brokers – to process a claim personal information about those involved and witnesses if applicable may need to be provided.
- Customers in general – to maintain our contract and service with them they may ask us about details of the supply to us of goods and services.
- Auditing companies to maintain our certifications and accreditations – supplier contracts, supplier questionnaires etc. may need to be accessed as part of these audits.
- Credit reference agency – to check your current status as a supplier, and if there should be any cause for concern relating to your ability to continue to supply goods and services to us.

It may sometimes be necessary to transfer your personal information overseas. When this is needed information is normally only shared within the European Economic Area (EEA). Our main data servers are located in the UK and maintained by a UK based data storage company. Data may be transferred outside of the EEA by the data storage company as part of their support provision to ensure continuity of service. We have a contract in place with the data storage company to ensure that the highest data security standards are maintained. Any transfers made will be in full compliance with all aspects of the data protection act.

What are your rights as a data subject?

If you would like to realise any of these rights please contact us using the contact details provided in the 'how to contact us' section of this document. Please make it clear what right you want to realise and be as specific as possible with what you want so that we can prioritise your request.

Right to be informed – you have the right to be informed about how and why we process your personal data. This privacy notice is designed to meet this requirement.

Right of access – you have the right to access your personal data that we hold on you. If you make a request please try and be as specific as possible about the type of data you would like to have access to and the time frames you would like us to look at. We may contact you to discuss your request to help meet your needs.

Right to rectification – you have the right to request that we rectify your personal data. We also want to make sure that your personal data is accurate and up to date.

Please let us know if there is data about you that you believe is incorrect and needs to be rectified.

Right to erasure (to be forgotten) – you have the right to request the deletion or removal of personal data. We believe that we have set out clearly the data we hold, the legal basis for processing the data and a realistic retention period which balances the rights of you as an individual against the interests of us and third parties. However, if you believe that we have data on you that should be deleted, please let us know, so that we can investigate.

Right to restrict processing – you have the right to request that we ‘block’ or suppress processing of data (including deletion of data). If you wish to exercise this right please let us know the reasons for this.

Right to object – you have a right to object to our processing of your personal data. If you wish to exercise this right please give clear details of the grounds of your objection.

Right to data portability – We do not believe that we hold data on our prospective suppliers, suppliers or former suppliers, that falls into the definition of this right within the GDPR regulations. However if you believe we are incorrect please let us know why and what data you believe we should enable for portability.

Rights related to automated decision making including profiling – you have a right to be informed that profiling or automatic decision making will be performed, right of access to things like the logic involved in automatic decision making, and the right not to be subject to a decision based solely on automated decision making. If we wish to profile your data or automate decisions based on your data we will let you know as soon as possible.

Changes to this privacy notice

We regularly review our privacy notices. The most up to date privacy notices are available on our website. The date of issue of this privacy notice is indicated in the footer of the document.

How to contact us?

Please contact us if you have any questions about this privacy notice or the personal data we hold about you:

Email: DataProtection@assurityconsulting.co.uk

Write: Data Protection Compliance Coordinator
Assurity Consulting Ltd
26 Redkiln Way
Horsham
West Sussex
RH13 5QH