

## **PrivacyPolicy:** Dutch Design (UK) Systems Limited, t/a Sphere8 is a flooring and walling installation company.

As an essential part of our business, we collect and manage client and non-client data. In doing so, we observe the UK data protection legislation, and are committed to protecting and respecting clients' and non-client's privacy and rights. As such, we act as a "Data Controller" in respect of the information gathered and processed by us.

To ensure that you are informed about how we operate, we have developed this privacy notice, which details how we collect, manage, process, store and share information about... The privacy notice also provides you with information about how you can have control over the use of your data. If you have any comments or queries regarding our use of your data, please contact our Data Protection Officer at info@sphere8.com. You can also write to our Data Protection Officer at Unit 1, Five Eastfields Avenue, London SW18 1FU.

### **WHAT INFORMATION DO WE COLLECT?**

In general terms, we collect information about you to enable us to:

- Administer our relationship with you, and respond to enquiries.
- Process applications for employment
- Deliver request information to you about our services and products
- Ensure the billing of any services and obtain payment
- Process and respond to any complaints
- Enable us to meet our legal and other regulatory obligations imposed on us

The information we need for these purposes is known as "personal data." This includes your name, address (work or home), email address, telephone and other contact numbers and financial information.

We collect this in several different ways. For example, you may provide this data to us by email, via our website, over the telephone, by letter, or through a contractual relationship.

We also process sensitive classes of information that includes:

- Psychological or mental health details
- Racial or ethnic origin

We will seek your permission if we need to record any of your sensitive personal data on our systems.

### **HOW DO WE USE THE INFORMATION?**

We use the data we collect from you for the specific purposes listed in the table below. Please note that this table also explains:

- The legal basis for processing your data, linked to each processing purpose
- In what circumstances your data will be shared with a third-party organisation

PURPOSE FOR PROCESSING DATA	LEGAL BASIS FOR PROCESSING DATA	WHIRLWIND ORGANISATIONS WITH WHOM DATA IS SHARED
To administer our relationship with you, to provide services and respond to enquiries.	To meet the requirements of a contract.	None.
To obtain information where necessary when recruiting.	In employing relevant staff.	None.
To fulfil our contract with our employees and to provide outsourced Human Resources, Private Health Care, Health & Safety and Training services.	To meet the requirements of a contract.	Inland Revenue, SME advisor, Health & Safety training companies, outsourced private health care companies, Pension Provider, Death in Service.
To ensure the billing of any procured services by you and ensure payment.	To meet the requirements of a contract.	Government VAT and tax inspectors, internal auditors.
To provide enquires support by telephone.	To fulfil contractual obligations this includes taking action before entering into a contract.	None.
To process and respond to complaints.	To meet a legal obligation.	None.

### YOUR RIGHTS

Under the terms of data protection legislation, you have the following rights:

#### 1. Right To Be Informed

This privacy notice fulfils our obligation to tell you about the ways in which we use your information.

#### 2. Right To Access

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a "Subject Access Request." Except in exceptional circumstances (which we would discuss and agree with you in advance), you can obtain this information at no cost. We will send you a copy of the information within 30 days of your request. To make a Subject Access Request, please write to our Group Data Protection Officer (details above).

#### 3. Right To Rectification

If any of the information that we hold about you is inaccurate, you can either contact us on 020 8969 0183 or contact our Data Protection Officer (details above).

#### 4. Right To Be Forgotten

You can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days.

#### 5. Right To Object

You have the right to object to:

- The continued use of your data for any purpose listed above for which consent is identified as the lawful basis for processing i.e. you have the right to withdraw your consent at any time.
- The continued use of your data for any purpose listed above for which the lawful basis of processing is that it has been deemed legitimate.

#### 6. Right To Restrict Processing

If you wish us to restrict the use of your data because

- you think it is inaccurate, but this will take time to validate,
- you believe our data processing is unlawful, but you do not want your data erased,
- you want us to retain your data in order to establish, exercise or defend a legal claim, or you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact our Data Protection Officer (details above).

#### 7. Right To Data Portability

If you would like to move, copy or transfer the electronic personal data that we hold about you to another organisation, please contact our Data Protection Officer (details above).

#### 8. Rights Related To Automated Decision-Making

If you would like to object to automated decision making without any individual involvement, and to the profiling of your data, please contact our Data Protection Officer (details above).

### IS THE PROCESSING OF INFORMATION LIKELY TO CAUSE INDIVIDUALS TO OBJECT OR COMPLAIN?

We are not aware of any justifiable reasons that would constitute a legitimate reason for objecting or complaining about the way we process or control information.

### HOW LONG WILL WE RETAIN INFORMATION FOR?

We will typically retain information for a period of seven years. This is due to regulatory reasons and to ensure our business records are adequate to maintain the requisite levels of insurance to protect our clients and non-clients.

### DATA PRIVACY AND SECURITY

We maintain a secure limited access system which includes processes for ensuring that data protection is a key consideration of all new and existing IT systems that hold personal data. Where any concerns, risks or issues are identified, we conduct relevant impact assessments in order to determine any actions that are necessary to ensure optimum privacy. We also maintain a secure limited access system which seeks to protect the availability, confidentiality and integrity of all physical and information assets.

Specifically, this helps us to:

- Protect against potential breaches of confidentiality;
- Ensure all IT facilities are protected against damage, loss or misuse;
- Increase awareness and understanding of the requirements of information security, and the responsibility of our colleagues to protect the confidentiality and integrity of the information that they handle; and
- Ensure the optimum security of this website

### COOKIES AND LINKS TO OTHER WEBSITES

In order to offer and provide a personal service through our website, we may use cookies to store and help track information about you. A cookie is a small text file sent to your device that we use to store limited information about your use of the website. We may use cookies to provide you with certain functionality (such as to enable access to secure log-in areas and to save you having to re-enter information into product or website forms) and to personalize our website content. Without cookies, this functionality would be unavailable.

By using our websites you agree that we can place these types of cookies on your device.

We may also use analytics tools provided by Google, Inc. ("Google") or other similar providers. Analytics tools serve cookies through our website and collect aggregated data on an anonymised basis about users and visitors' use of the website. The data collected enables us to understand aggregated user or visitor activity and how we may improve our website or charitable offering. This data is collected and used on an anonymised, aggregated basis only and does not enable any user or visitor to be personally identified. In addition, we may also use marketing automation tools. These companies serve cookies to profile users or visitors' interests and activity. We may use data collected through these cookies to serve users or visitors with information, new articles and advertising tailored to their specific needs and requirements. You have the right to refuse or disable cookies served through our website although, if you choose to do so, certain functionality may become unavailable to you. As the means by which you may do this vary from browser to browser, we recommend that you visit your browser's help menu for further information. We respect your right to choose whether or not to accept cookies. Please note that if you do not set your browser and e-mail settings to disable cookies, you will be indicating your consent to receive them.

If you wish to find out more about cookies and clear gifs, you may like to visit [www.allaboutcookies.org](http://www.allaboutcookies.org) an independent third-party resource that explains what cookies and clear gifs are and how you may manage them. Please note that we are not responsible for, and have no control over, the content of this third-party website. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### GENERAL

Questions and comments regarding this Privacy Notice are welcomed and should be sent to our Data Protection Officer (details above).

You can also contact our Data Protection Officer if you have any concerns or complaints about the ways in which your personal data has been handled.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted at [www.ico.org.uk](http://www.ico.org.uk)