



ADAMS HENDRY CONSULTING LIMITED PRIVACY NOTICE FOR SUPPLIERS AND PROSPECTIVE SUPPLIERS

Data Controller:

Adams Hendry Consulting Ltd (AHCL)

Data Controller's Representative:

Philip Rowell, Director

Data Processor:

Philip Rowell, Director in charge of Data Protection

Introduction

1. AHCL collects and processes personal information, or personal data, relating to suppliers and prospective suppliers to AHCL in order to make purchases for the business and to manage the working relationship. This personal information may be held by AHCL on paper or in electronic format.

2. AHCL is committed to being transparent about how it handles such personal information, to protecting the privacy and security of such information and to meeting its obligations under the General Data Protection Regulations ('GDPR') and the Data Protection Act 2018. The purpose of this privacy notice is to make our suppliers aware of how and why AHCL will collect and use personal data both during and after any relationship with AHCL. AHCL are required under the GDPR to inform its suppliers of the information contained in this privacy notice.

3. This privacy notice applies to all current, prospective and former suppliers, their employees and internal suppliers ('suppliers').

Data protection principles

4. Under the GDPR, there are six data protection principles that AHCL must and will comply with. These provide that the personal information which we hold in respect of our suppliers must be:

- a) Processed lawfully, fairly and in a transparent manner.
- b) Collected only for legitimate purposes that have been clearly explained and not further processed in a way that is incompatible with those purposes.
- c) Adequate, relevant and limited to what is necessary in relation to those purposes.
- d) Accurate and, where necessary, kept up to date.
- e) Kept in a form which permits identification for no longer than is necessary for those purposes.
- f) Processed in a way that ensures appropriate security of the data.

What types of personal information do we collect about our suppliers?

5. Personal information is any information about an individual from which that person can be directly or indirectly identified. AHCL collects, uses and processes a range of personal information about its suppliers. This includes (as applicable):

- a) Name;
- b) Business Address;
- c) Personal Address;
- d) Business phone number;
- e) Personal phone number;

f) Business e-mail address;

6. AHCL do not consider that they hold or process any 'special categories' of personal information about its suppliers.

How is personal information collected?

7. AHCL collects the range of personal information about its suppliers listed in paragraph 5 in the course of its work.

Why and how do we use the personal information we collect?

8. AHCL will only use the personal information it collects from its suppliers when the law allows it to. These are known as the lawful basis for processing. AHCL will use its suppliers' personal information in one or more of the following circumstances:

- a) where AHCL needs to do so to perform any contract or agreement it has entered into with the supplier, or in order to take appropriate steps to enter into a contract with the supplier.
- b) where AHCL need to comply with a legal obligation.
- c) where it is necessary for AHCL's legitimate interests (or those of a third party), and the interests or fundamental rights and freedoms of the individual concerned do not override those interests.

9. AHCL requires all of the types of personal information listed under paragraph 5. AHCL's legitimate interests include the full range of activities required for the day-to-day running of AHCL and its offices. In summary, this constitutes the legitimate interests of the business. AHCL believe that our suppliers have a reasonable expectation that it will process this type of personal information.

Change of purpose

10. AHCL will only use personal information for the purposes for which it has been collected. If AHCL needs to use personal information for a purpose other than that which it was collected, it will update this privacy notice and provide it as necessary.

Who has access to personal information?

11. Suppliers' personal information may be shared internally within AHCL. Suppliers' personal information may also be shared with other parties including: our clients, external companies and technical suppliers; external statutory suppliers and bodies, external non-statutory bodies and organisations, and members of the public.

12. Personal data will be shared internally within AHCL and other parties for the purposes of or in connection with purchases or potential purchases or for legitimate reasons of developing the business of AHCL.

How does AHCL protect suppliers' personal information?

13. AHCL has put in place measures to protect the security of suppliers' personal information. It has internal policies, procedures and controls in place to try and prevent personal information from being accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to suppliers' personal information to those AHCL employees who have a business need to know in order to perform their job duties and responsibilities. Further information about these measures can be obtained, in the first instance, from AHCL's Office Manager.

14. Where suppliers' personal information is shared with external bodies, we take appropriate steps to ensure that they hold and process the information in accordance with data protection law.

15. AHCL has in place appropriate procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and the appropriate advisor of a suspected breach where we are legally required to do so.

How long will AHCL keep suppliers' personal information?

16. AHCL will only retain suppliers' personal information for as long as is necessary to fulfil the purposes for which it was collected and processes, including for the purposes of satisfying any legal, professional indemnity, health and safety, reporting, tax or accounting requirements.

17. Having regard to town planning and related law, and other legislation with which AHCL has to comply, suppliers' personal information will generally be held for a minimum of ten years from the end of any relationship between AHCL and the supplier.

18. Personal information which is no longer to be retained will be securely and effectively destroyed or removed from our IT systems.

Suppliers' rights in respect of personal information.

19. It is important that the personal information we hold about our suppliers is accurate and up to date. Suppliers are asked to please keep us informed if personal information changes, AHCL cannot be held responsible for any errors in personal information in this regard unless they have been notified of any relevant change.

20. AHCL's suppliers have a number of statutory rights in respect of personal information. Subject to certain conditions, and in certain circumstances, AHCL's suppliers have the right to:

- request access to personal information - this is usually known as making a data subject access request and it enables suppliers to receive a copy of the personal information AHCL holds about them and to check that it is being lawfully processed;
- request rectification of personal information - this enables suppliers to have any inaccurate or incomplete personal information AHCL hold corrected;
- request the erasure of personal information - this enables suppliers to ask AHCL to delete or remove personal information where there's

no compelling reason for its continued processing, e.g., it is no longer necessary in relation to the purpose for which it was originally collected;

- restrict the processing of personal information - this enables suppliers to ask AHCL to suspend the processing of personal information, e.g., if suppliers contest its accuracy and so want AHCL to verify its accuracy;
- object to the processing of personal information - this enables suppliers to ask AHCL to stop processing personal information where AHCL are relying on the legitimate interests of the business as its legal basis for processing and there is something relating to the particular situation which makes the suppliers decide to object to processing on this ground, and
- data portability - this gives suppliers the right to request the transfer of personal information to another party so that suppliers can re-use it across different services for their own purposes.

21. If there are any suppliers who wish to exercise any of these rights, please contact AHCL's Office Manager in the first instance. AHCL may need to request specific information from you in order to verify your identity and check the advisor's right to access the personal information or to exercise any of the advisor's other rights. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

22. If you believe that AHCL has not complied with data protection rights, suppliers have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

Transferring personal information outside the European Economic Area

23. AHCL will not transfer suppliers' personal information to countries outside the European Economic Area.

Automated decision making

24. Automated decision making occurs when an electronic system uses personal information to make a decision without human intervention. AHCL will not use automated decision making.

Changes to this privacy notice

25. AHCL reserves the right to update or amend this privacy notice at any time, including where AHCL intends to further process suppliers' personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. AHCL will issue a new privacy notice when it makes significant updates or amendments. AHCL may also notify suppliers about the processing of personal information in other ways.

Contact

26. If suppliers have any questions about this privacy notice or how AHCL handle personal information, please contact AHCL's Office Manager, whose contact details are provided below:

Adams Hendry Consulting Ltd
Sheridan House,
40-43 Jewry Street
Winchester
Hampshire
SO23 8RY

Telephone: 01962 877414

Email: k.woolgar@adamshendry.co.uk