

**Aquatic Control Engineering** 

# General Data Protection and Privacy Policy

Date Reviewed: 07/06/2023

Next Scheduled Review: 07/06/2024



# **Data Privacy and Protection Policy Arrangements Index**

- 1. Introduction to GDPR changes
- 2. Data Information we collect
- 3. IP address and Cookies
- 4. The purpose of information processed
- 5. Storage and retention of information
- 6. Subject Access Request Disposal of sensitive or confidential information
- 7. Links to other sites
- 8. Aquatic Control Engineering employees
- 9. CCTV Policy

<u> Aguatic Control Engineering are registered ICO Tier 2 members – Expiry 2023</u>

### **General Data Protection Regulations**

#### 1. Introduction

Aquatic Control Engineering Ltd ("We") understand the importance of and are committed to protecting your privacy and any information you provide. We appreciate and abide by the correct and lawful treatment information as out lined by the Data Protection Act 1998 and the UK General Data Protection Regulations (UK GDPR.)

This company policy outlines why data that is either provided by you, or collected by us, is processed and put into practice. Please read our following statements regarding your personal information and in what manner we treat it. We fully endorse and adhere to the GDPR Regulations, taking into account Article 5 and the following:

- Lawful Basis of data collection
- Consent of data collection
- Subject Access Requests
- Breaches and the Information Commissioner's role
- Accountability of data
- Individual's rights
- Pseudonymisation (SECURE information and linkage of information)

If at any point you have any questions about our practices or any of the rights under GDPR, you may contact the Data Protection Representative by email; <a href="mailto:helen@aquaticcontrol.co.uk">helen@aquaticcontrol.co.uk</a>

# 2. Data Information we collect

Direct Personal Data includes information such as:

- Name
- Address
- Telephone Number
- Job Title
- Date of Birth (employee personal data collected)
- Email Address
- Other data collected that could directly or indirectly identify you













We may collect information about you, which likely considers personal data, consisting of any, all or a combination of the following:

- Information that is provided by you when completing forms on <a href="www.aquaticcontrol.co.uk">www.aquaticcontrol.co.uk</a> (our website).
- Information provided by you through any channels of communication e.g. email, telephone, etc.
- If you chose to contact us, we may keep a record of that correspondence, for example a speculative application to working with Aquatic Control Engineering Ltd.
- For research purposes we may ask you to complete surveys such as post order or sales surveys.
- Completing contact forms on new orders with our sales managers
- When applying for a job via our website or social media forums
- When delivering our services to you to ensure necessary and optimal performance

We may collect additional information that may not be as obvious to you, which is collected in association with your use of our services or vice versa. This information is known as Account Related Information and can include account number, invoice address, telephone number.

# 3. IP address and Cookies

We may collect general internet usage information about you by using a cookie file through our website and stored on your computer. This data helps us communicate to you and deliver a more personalised service. Cookies help us in distinguishing individual users from each other.

These cookies enable us to:

- Estimate the size of our audience.
- Estimate our audience's usage pattern.
- Customise our website according to individual preferences and interests.
- Recognise who is returning to our website

You can refuse to accept cookies by going into your browser settings and altering the cookie settings. If you do select this however, this may render you unable to access specific areas of our site. If you haven't altered your browser settings to make it refuses cookies, our system will automatically issue cookies when you access our website.

# 4. The purpose of information processed

We use information gathered about you in the following ways:

- To provide you with information, products or services that you request from us.
- To provide you with information, products or services which we feel may be of interest to you
- To carry out any contractual obligations arising between you and us.
- To send you a notification outlining any changes to our service or contractual agreement.













We will use the information held about you for the purposes for which it was provided to us as stated at the point of collection (or as is obvious from the context of collection). An example of this may include providing you with the brochure you have requested, consider your job application or sending out a newsletter.

Information is only used and stored for the legitimate reason as outlined in our GDPR Policy and is treated as strictly confidential.

Aquatic Control Engineering do not share information with the third parties without asking your consent first. We do not sell your data for any purposes at all and your data will be treated as strictly confidential on the company's behalf.

#### 5. Storage and retention of information

Aquatic Control Engineering Ltd have an IT support service called F5. F5 have provided a GDPR statement relating to the GDPR review on specific supporting information; this is available upon request.

The following sites we use provide cloud-based storage of information:

- iCloud
- Dropbox
- Google Drive
- We Transfer
- Zoho
- Aquatic Control Engineering Ltd social media sites including, Facebook, Instagram, Twitter and Linked-In

The information collected by us will only be stored for as long as is required and only for the purpose it was collected for or as required by law. Your information is shared only in connection with and in compliance with applicable laws and regulations.

Where you have been provided (or requested) login details and a password which grants you access to specific areas of our website, you have full responsibility for keeping these details private and confidential. We insist you do not share a password with anyone.

All company employees use computer drives to store information.

We will only hold data where there is an ongoing relationship with you or your company. We will delete all information where this relationship is deleted except where we may be legally obliged to.

# 6. Subject Access Request & Disposal of sensitive or confidential information

You have the right to access, view, update and delete personal information we have about you. You may contact the Data Protection Representative to make a request (contact shown in introduction).

If you make a request to delete your personal data and that data is necessary for lawful reasons, contractual record keeping requirements or legitimate business purposes, we may reserve the right to keep the information and the request will not be honoured.













All data must be securely disposed of when no longer required by Aquatic Control Engineering Ltd, or requested by yourself, regardless of the media or application type on which it is stored. When disposing sensitive or confidential information we will make sure the information cannot be reconstructed or recovered.

#### 7. Links to other sites

Certain areas of our website contain links to other websites. These mainly link to either our supply chain or other partners and clients, but also those of other third parties. We do not directly pass on your data information.

Please be aware that these websites do not adhere to our privacy policy (or any other of our policies) and that we do not accept responsibility or liability for these policies. We advise that you review their policies before you submit any personal data to these websites.

# 8. Aquatic Control Engineering employees

All employees have the same rights as outlined in this policy. You have the right to request to see any of your personal information we may hold and any information that is linked to you. You also have the right to request to be removed from our database.

Upon Employment with Aquatic Control Engineering, personal data (as listed above) will be stored on the Company Management drive and locked within your personal employee folder. This data is kept for a minimum of 6 years in line with legal requirements and not kept any longer than is necessary for a legitimate purpose.

You can access more information by contacting the Data Protection Representative.

The Company would like to use your job profile which could include the following:

Full name of employee

Job Title

Job description and specific project works

Qualifications and professional development

Personal statement

The purposes in which we might use this information are for:

Social Media marketing

CV's for tender work

CV's for auditing

**Newsletters** 













- ✓ As this is personal data to you, we will never use this information without receiving your consent form.
- ✓ We will notify you every time we use any part of your personal information.
- ✓ You have the right to ask for this information to be removed from our records.
- ✓ The information is stored on our specific marketing drive where access is restricted.

### 9. CCTV Policy

Aquatic Control Engineering have assessed the business risk for the installation of a CCTV system at the designated specific Warehouse area, external only. The purpose of this is for the security of the business, due to the nature of the works ongoing surrounding this particular area and potential theft.

- Any CCTV footage taken is stored both in the cloud via Ring software and on a DVR recording at ACE premises
- The persons responsible for the CCTV, and who have access to this CCTV footage are Stephen Randall (MD) and Martin van Nieuwenhuijzen (Sales Director)
- The CCTV footage runs 24 hours a day Monday Sunday
- There is currently no business requirement for audio to be recorded
- The videos are stored for 30 days before they are automatically deleted (Ring system) or overwritten on the DVR automatically when capacity is full (Fixed CCTV System), both systems are restricted with access requiring either a password or an invite
- Motion sensing on the Ring camera provides notifications outside of business hours (via app to Stephen and Martin) and other cameras can be accessed in live view from the app to check any alerts.
- CCTV Signage stating CCTV is in operation, is both at the gated entrance of Aquatic Control Engineering and on the Warehouse building itself.

No CCTV is installed in any private areas of the company and all employees have a right, both within this GDPR policy and CCTV policy, to their privacy.

Should you require any information in relation to the CCTV system or data please contact either Helen van Nieuwenhuyzen as data protection officer or Stephen Randall (MD). Signed:

Stephen Randall

**Managing Director** 









