

## Customer GDPR Privacy Notice

### How your information will be used

1. As a Customer of this Company we need to collect, keep and process information about you for normal trading purposes. The information we hold and process will be used for our management and administrative use and will be shared in order to carry out our business purposes. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the first engagement process and whilst you are trading with us. This includes using the information we collect from you to enable us to comply with any legal requirements, pursue the legitimate interests of the Company and to protect our legal position. If you do not provide this data, we may be unable in some circumstances to trade with you.
2. The company need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests is covered within the GDPR Legislation. We will never share or process your data where these interests are overridden by your own interests.
3. All of the information we hold will have been provided by you. Information about you may be sort from third parties but only with your full prior consent.
4. The sort of information we hold includes, your contact details including address, telephone numbers, vehicle registration number, email addresses, your bank details and your identification documents. We will now also keep GDPR consent form electronically and in paper form within your customer file. This may be used if we need to correspond with or about you, to pay you directly into your bank, or to post out cheques to you.
5. You will, of course, inevitably be referred to in many company documents and records that are produced by the business of the company. You should refer to the full GDPR (Data Protection Policy) which is available in paper format from Sam Robertson who is the companies Data Protection Officer. This document is in far more detail about how we treat your privacy than this Privacy Notice

6. There may be a need in certain circumstance to share your personal data with a Third Party who support our computer systems. This will only ever be time limited and only if and when absolutely necessary.
7. As required by law your data may be shared with a Third Party if we are specifically asked for information about you.
8. We have set retention and deletion periods for all personal details that we hold both paper and digitally under GDPR policies. Therefore, your information may be held within their systems to be used for instance to produce the companies' year end accounts. The expectation would be that your personal information would be retained for this purpose once the year end is completed this information will be archived for the retention period of seven years and deleted from our systems.
9. Under GDPR there is a separate definition for special categories of information, whilst we do not collect much within this category we will always obtain your explicit consent to do so where we are required by law. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
10. We do not use automated decision making (including profiling) nor would your information be transferred outside of the EEA or to any international organisation unless to comply with any legal obligations. If this wherever to be the case we would seek your explicit consent.
11. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

## **Your rights**

12. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and

rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

13. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
14. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

**Identify and contact details of controller and data protection officer for this company**

15. John Brocklesby Metal Management Ltd is the controller and processor of data for the purposes of the DPA 18 and GDPR.
16. If you have any concerns as to how your data is processed you can contact:

Sam Robertson Data Protection Officer at John Brocklesby Metal Management Ltd. Email [jbmmltd@live.co.uk](mailto:jbmmltd@live.co.uk) or you can write to her at the above address.

This privacy notice is underpinned by a GDPR policy a copy of which can be provided to you in paper format on request from the contact details give above.