

Privacy Notices Policy

1.0 Why we have this policy

It is a requirement of the Data Protection Act 1998 that, at the point we capture someone's personal details and information, we give them notice of why we are collecting it and what we are going to do with it, and who we are going to share it with and why.

If we are going to store it in computers outside the EU we also need to give notice.

The other reason we need to do this is to:

- (1) ensure we think about what information we need and use so we do not fill our business with useless data; and
- (2) to ensure that we have a business which is legally compliant; and
- (3) to ensure we create a business which has valuable data in it.

For the purposes of the Data Protection Act and General Data Protection Regulations McEwan Wallace Limited are data controllers and we can be contacted at:

McEwan Wallace
68 Argyle Street
Birkenhead
Wirral
CH41 6AF

2.0 What this policy covers

This policy covers all documents, forms, telephone calls, website forms and any other point at which the business gathers personal data on clients, potential clients, suppliers and other living individuals. It applies to all our directors, employees, temporary and agency staff.

This policy also covers any instances or assignments where McEwan Wallace Limited engages the services of third parties where the exchange and use of personal data is necessary.

3.0 THE POLICY

We will ensure that:

- (1) we will only capture personal data when we need it; and
- (2) whenever personal data is captured from any living individual that at the first point of capture we will give an appropriate Privacy Notice and at each subsequent time we capture:
 - (a) further personal data; or
 - (b) want to use it for a new purpose.
- (3) we retain data for as long as necessary for the purposes for which it was obtained and to comply with statutory requirements.

- (4) where we require consent for marketing or to capture sensitive personal data we will ensure:
 - (a) we are explicit in the Privacy Notice and
 - (b) obtain written consent (in the case of marketing consent we will provide written confirmation to the individual as soon as possible after the event if the consent was obtained over the telephone or other direct conversation where no form was available).
- (5) we will always be open and honest with our clients in our data privacy practices.
- (6) we will apply the methods of the Sales and Marketing guide, Privacy Notices guide and Covering the Data Capture points guides provided by the Data Guardians as a minimum standard for making and providing Privacy Notices and obtaining marketing consents.

4.0 Data subject rights

All individuals have rights relating to their personal data collected and retained by others. These rights include:

- (1) the right to withdraw consent to the holding of such data at any time
- (2) the right to erasure of personal data subject to any legal requirements to retain data
- (3) the right to complain to the Information Commissioner's Office (ICO) if it is thought that personal data has not been handled appropriately.

The ICO can be contacted via <https://ico.org.uk/>

We will ensure any requests in respect of these rights are acted upon as soon as practicable following receipt.