



PRIVACY NOTICE

INTRODUCTION

Lift and Engineering Services Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Customers, the End Users of our Customers, our Suppliers, our Subcontractors and our Employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. **Information About Lift & Engineering Services Ltd**

Registered Company Name: Lift and Engineering Services Ltd (who trade as Lift & Engineering Services Ltd)

Company Registration: A limited company registered in England via Companies House and under company registration number 01913516.

Registered address: 16 Portersfield Road, Cradley Heath, West Midlands, B64 7BN

Trading addresses:

- 16 Portersfield Road, Cradley Heath, West Midlands, B64 7BN
- 232 Leicester Road, Markfield, Leicestershire, LE67 9RG
- 275 Pinner Road, Harrow, London, Middlesex, HA1 4HF

VAT number: GB 377 355 519

Data Protection Coordinator:

- Roy Casey
- roy.casey@lift-engineering.co.uk
- 01384 633115
- 16 Portersfield Road, Cradley Heath, West Midlands, B64 7BN

Data Protection Officer: thyssenkrupp and to be accessed via Roy Casey

Data Protection Act: We are registered with the Information Commissioner's Office – reference Z9964260

2. **What Does This Notice Cover?**

This Privacy Notice explains how we use your personal data; how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.



4. **What Are Your Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact our Data Protection Coordinator to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do We Collect?**

According to your relationship with us we may collect some or all of the following personal data:

- Name of person or contact person(s)
- Date of birth
- Gender
- Address
- Email address(es)
- Telephone number(s)
- Details of disabilities or medical conditions which give rise to your use of mobility lifting equipment
- Business name
- Business registration number(s)



- Business membership(s)
- Job titles
- Profession
- Payment information
- CVs and training records
- Employment identifiers and payment information, including any Court Orders for earnings attachment
- Employee next of kin information

Some data about you may be received from third parties over whom we have no control as to the way they obtain or process your data, examples would be if you are a tenant of our Customer or an employee of a subcontractor or a candidate for employment. We are not responsible for, and do not accept liability for, the security or the actions or content provided to us by 3rd parties with whom we do business.

6. **How Is Your Personal Data Used?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it, e.g. as your employer. Your personal data may be used for one or more of the following purposes:

- Employing you or considering you for employment
- Responding to enquiries from you in respect of purchasing our products and services or prequalifying to be on an approved list of suppliers or bidders
- Supplying our products and services to you in direct contract. Your personal details are required in order for us to enter into a contract with you.
- Supplying our products and services to you through an indirect relationship procured by a third party on your behalf. Your personal details are required in order for us to fulfil their contract/obligations with us
- Purchasing services or products from you
- Providing and managing your account
- Communicating with you. This may include responding to emails, correspondence or calls from you
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing our Data Protection Coordinator at any time)

With your express permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. **How Long Will We Keep Your Personal Data**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for



the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Potential employees – up to 12 months from the date of receipt of your data
- Employees – a minimum of 3 years after leaving our employment (HMRC period), normally 5 years and if you may have come in to exposure with asbestos in the course of your employment 40 years
- Potential customers - up to 24 months from the date of receipt of your enquiry
- Customers – the minimum retention period stipulated in the contract between us or 6 years by default in accordance with accounting records requirements
- Suppliers and subcontractors – the minimum period stipulated for retention of our own records in the contract between us and our customer
- Customers/Tenants of our customers to whom we provide services under our customer's contract - the minimum retention period stipulated in the contract between us and our Customer or 6 years by default in accordance with accounting records requirements

8. **Where & How is My Data Stored or Transferred**

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

For employees we also share your data within the thyssenkrupp group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. thyssenkrupp's Data Protection Officer can be contacted for further information on use of employee personal data within the group of companies.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Storage on servers within the company and not on cloud based systems
- The certification of our operations to Cyber Essentials level
- Security access levels to servers and management systems, which restricts access to limited users and data processors
- Retention of hard copy information in locked secure areas

9. **Do We Share Your Personal Data**

If you are an employee, we may share your personal data with other companies in our group as described above. We may sometimes contract with third parties to supply services to you on our behalf. In some cases, those third parties may require access to some or all of your personal data that we hold, e.g.

- Pension providers
- Insurers
- DBS check providers
- Driving registration schemes
- Trainers



- Financial auditors

We may also share personal data in the form of employee CVs, training records, and DBS check reference numbers with a limited number of organisation's to whom the company wishes to provide services or products when required by the terms of their contracts and tenders.

For non employees, if any of your personal data is required by a third party, as part of a contractual arrangement we hold with them, we will take steps to require that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8. Instances in which such arrangements may exist are:

- Identification of subcontractors to our customers
- Identification of lift users to suppliers or subcontractors
- Site reports on lifts which include name and address of tenant or customer

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can You Access Your Personal Data**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days, and in any case, not more than one calendar month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress and any extended timescale beyond 28 days.

11. **How Do You Contact Us**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Mark for the attention of: Roy Casey

Email address: roy.casey@lift-engineering.co.uk or mailbox@lift-engineering.co.uk.

Telephone number: 01384 633115.

Postal Address: 16 Portersfield Road, Cradley Heath, West Midlands, B64 7BN

Subject Field: Please mark the subject data field of your email or letter "GDPR Request for Information"

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for



example, if the law changes, or if we change our processes or business in a way that affects personal data protection.

Any changes will be made available via our website.