

INTRODUCTION

Union Technical Services Limited respects your privacy and is committed to protecting your personal data. This Data Protection Management Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Our Data Protection Management Policy states that we understand that we are responsible for your personal data. It outlines how we collect and process your personal data and it explains why we are using data throughout and after our working relationship, in accordance with the Data Protection Act 2018 and The General Data Protection Regulation 2018.

Our appointed data protection lead is responsible for overseeing questions in relation to this Data Protection Management Policy. If you have any questions about this Data Protection Management Policy, including any requests to exercise your legal rights, please contact the data protection lead using the details set out below.

CONTACT DETAILS

Name: Suzanne Coyle

Position: Director

Our Company: Union Technical Services Limited

Address: Head Office

Unit 14, Block 8, Spiersbridge Terrace, Thornliebank Ind. Est, Glasgow G46 8JH

Registered Address

c/o Horizon Ca, 11 Somerset Place, Glasgow, G3 7JT

Email: enquiry@uniontechnical.co.uk

We would appreciate the chance to deal with your concerns directly but if you would prefer or are not satisfied with our response, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

CHANGES TO THE DATA PROTECTION MANAGEMENT POLICY AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

DATA PROTECTION PRINCIPLES

Union Technical Services Limited is committed to complying with data protection law.

Personal information we hold about you will be:

1. Used lawfully, fairly and in a transparent way.
2. Only collected for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, passports, driving licences, DBS checks etc.
- Contact Data includes personal and/or business address, email address and telephone numbers
- Transaction Data includes details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and CRM.
- Profile Data includes username and passwords.
- Usage Data includes information about how you use our website and CRM, CRM, social Media platforms, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Information about your health for Health & Safety Management
- Information on Travel and accommodation arrangements for Health, Safety and wellbeing Management

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data).

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including through:

- Direct interactions. You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website and CRM, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to.

We will use your personal data in the following circumstances:

1. Where we need to perform the contract, we are about to enter into with you, or have entered into with you.
2. Where we need to comply with a legal, or regulatory obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or social media. You have the right to withdraw consent to marketing at any time by contacting us or the relevant social media platform.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> – Identity – Contact – Benefit details 	<ul style="list-style-type: none"> – Performance of a contract with you
To process and deliver your product /service	<ul style="list-style-type: none"> – Identity – Contact – Benefit checks – Marketing and Communications 	<ul style="list-style-type: none"> – Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Data Protection Management Policy (b) Asking you to leave a review or take a survey	<ul style="list-style-type: none"> – Identity – Contact – Profile – Marketing and Communications 	<ul style="list-style-type: none"> – Performance of a contract with you – Necessary to comply with a legal obligation – Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and our website and CRM (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> – Identity – Contact – Technical 	<ul style="list-style-type: none"> – Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) – Necessary to comply with a legal obligation
To deliver relevant website and social media content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> – Identity – Contact – Profile – Usage – Marketing and Communications – Technical 	<ul style="list-style-type: none"> – Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, social media and CRM, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> – Technical – Usage 	<ul style="list-style-type: none"> – Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website, social Media and CRM updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> – Identity – Contact – Technical – Usage – Profile 	<ul style="list-style-type: none"> – Necessary for our legitimate interests (to develop our products/services and grow our business)
To provide a safe and secure environment for staff and visitors, and to prevent the loss or damage to the Company property at Head office premises in the use of closed-circuit television (CCTV) images in line with the CCTV Policy	<ul style="list-style-type: none"> – Video and photographic images 	<ul style="list-style-type: none"> – Necessary for our legitimate interests in: <ul style="list-style-type: none"> • Protecting the Company buildings and Company assets • Promoting the health and safety of staff and visitors • Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)

MARKETING

We are committed to using your personal data in a focused way during our marketing and advertising processes in order to provide you with information that we believe that may be of benefit to you.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will not share your personal data with any company outside the Union Technical Services Limited for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the client area and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt out links on any marketing message sent to you or by Contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

THIRD PARTY LINKS

Our website does not include links to third-party websites, plug-ins or applications.

We encourage you to read the Privacy Policy of our website when you visit it.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Data Protection Management Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We will not transfer your personal data outside UK.

Some of our third party providers set out in the Glossary may transfer your personal data outside the UK but not the European Economic Area (EEA). We require all third parties transferring data outside of the EEA to be certified to the relevant Privacy Shield Framework and the commitments they entail. Third party providers must notify the Company in the event that they make a determination that they can no longer meet their obligation to provide the same level of protection as is required by the Privacy Shield principles.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Full details of Data Management can be found in 04 Data Management Plan

Please find below a summary of Data retention on Subject areas:

Subject	Data/Information	Retention
Employees Applicants	Contact details (name, email address, telephone number, home address) Education and employment history, and proof of qualifications Information provided by professional and personal referees Information generated during the recruitment process itself (such as interview notes, and your answers to assessment questions) Information about your regulatory or other professional memberships Identity documents such as a copy of your passport (including information about your national origin) or other right to work documentation Information about a disability which may affect the application process Pre-employment health data Self-declaration of any unspent criminal convictions Information obtained from the Disclosure and Barring Service"	Unsuccessful Applicants 1 Year in line with Annual Document Retention Review date (In case another position arises or if challenged by an employment tribunal) Successful Applicants will be managed as details in Employees General

Subject	Data/Information	Retention
Employees General	<p>Basic staff and training records, including:</p> <ul style="list-style-type: none"> • Written particulars of employment, contracts of employment, and notices of changes to terms and conditions • Induction Records • Job training records and qualifications • Performance assessment reports • Disciplinary/grievance matters • Leave records - Annual/Sick/Unpaid/Statutory • Resignation, termination and/or retirement letters <p>Employee personal data form (emergency contact and address information) Medical, health and accident & incident records Health Surveillance Records Emails and email accounts Promotional photos in presentations, marketing, advertising and social media</p>	<p>25 Years post termination of employment in line with Annual Document Retention Review date (To demonstrate competence of personnel in product traceability for warranty purposes)</p> <p>40 Years Health Records (Statutory Requirement)</p>
Employees Financial	<p>Travel and subsistence claims Maternity, Adoption, Paternity, Shared parental leave records Sickness records Personnel Records with Staff bank details Payroll and wage records PAYE Pension scheme records</p>	<p>6 Years in line with HMRC guidance + 1 year buffer</p> <p>40 Years Health Records (Statutory Requirement)</p>
Employees External Parties	<p>Employee related benefits information Disability claim files Litigation files Immigration checks Records of access / disclosure requests Enforcement agencies</p>	<p>6 Years in line with HMRC guidance + 1 year buffer</p> <p>40 Years Health Records (Statutory Requirement)</p>
Customer Potential	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> • Contact Data includes business address, email address and telephone numbers • Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. • Profile Data includes username and passwords. • Usage Data includes information about how you use our website, products and services. • Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. 	<p>6 Years + 1 year buffer (To inform potential customers of new measures that they may be eligible for)</p>
Customers	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> • Benefits information • Contact Data includes business address, email address and telephone numbers • Transaction Data includes details of products and services you have purchased from us. • Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. • Profile Data includes username and passwords. • Usage Data includes information about how you use our website, products and services. • Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. <p>Traceability information on Big Change</p>	<p>7 years as a minimum, or 25 Years post termination of employment in line with Annual Document Retention Review date (To demonstrate competence of personnel in product traceability for warranty purposes)</p>

Subject	Data/Information	Retention
Supplier Components	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> Contact Data includes business address, email address and telephone numbers Transaction Data includes details of products and services you have purchased from us. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. Profile Data includes username and passwords. Usage Data includes information about how you use our website, products and services. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. <p>Third Party Certification and Insurances Product Traceability information on Big Change</p>	<p>25 Years post termination of employment in line with Annual Document Retention Review date (To demonstrate competence of personnel in product traceability for warranty purposes)</p>
Supplier Service	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> Contact Data includes business address, email address and telephone numbers Transaction Data includes details of products and services you have purchased from us. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. Profile Data includes username and passwords. Usage Data includes information about how you use our website, products and services. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. <p>Third Party Certification and Insurances</p>	<p>6 Years post service + 1 year buffer in line with Annual Document Retention Review date (Accounts requirement)</p>
Supplier Sub Contract	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> Contact Data includes business address, email address and telephone numbers Transaction Data includes details of products and services you have purchased from us. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. Profile Data includes username and passwords. Usage Data includes information about how you use our website, products and services. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. <p>Third Party Certification and Insurances Employee Qualifications Risk Assessments/ Health & Safety Documentation Traceability information on Big Change</p>	<p>25 Years post termination of employment in line with Annual Document Retention Review date (To demonstrate competence of personnel in product traceability for warranty purposes) 40 Years Health Records (Statutory Requirement)</p>
Website	<p>Identity Data includes first name, last name</p> <ul style="list-style-type: none"> Contact Data includes address, email address and telephone numbers Transaction Data includes details of products and services they may be interesting in purchasing from us. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. 	<p>Immediate Disposal</p>
Access to Company Head Office	<ul style="list-style-type: none"> Identity Data includes first name, last name, CCTV footage Health Surveillance Records 	<p>1 Month for CCTV (for security and health & safety purposes) 10 Years for Management System Records - Health Surveillance records and Visitor sign in records (To demonstrate Health & Safety Compliance)</p>

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Under certain circumstances, by law you have rights under data protection laws in relation to your personal data, as follows:

- Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data in the following scenarios: a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or a third party. We will provide you or a third party you have chosen, your personal data in a structured, commonly used, readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our appointed data protection lead.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access the data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Our appointed data protection lead. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

CHANGES TO THIS DATA PROTECTION MANAGEMENT POLICY

We reserve the right to update this policy at any time, and we will provide you with a new Data Protection Management Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

- Funding bodies
- Local Authorities and Housing providers
- Sub Contractors

External Third Parties

- Regulators, who we use for our compliance and ISO Certification
- Hosting services
- Professional advisers including lawyers, bankers and insurers based in the UK who provide banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Product Guarantors

MONITORING AND REVIEW OF THE POLICY

This policy is reviewed by the Company to ensure it is achieving its stated objectives.

Managing Director - Michael Sweeney

Signed: 

Version 3: 04.02.2021 Reviewed on: 06.07.2023