

# Privacy Notice: Suppliers and Business Contacts

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## Privacy Notice

Eacotts (the “Data Controller”) cares about the individuals we work with, whether as our suppliers, or as our business contacts at other other organisations. We only collect and use information in line with the General Data Protection Regulation, the Data Protection Act and any other applicable laws and regulations.

This Privacy Notice fulfils our obligation to notify you about our processing activities and applies to our suppliers and business partners who are natural persons – including individuals from whom we buy services and or who act as a point of contact for a business or organisation.

## What categories of Personal Data do we process?

We process the following kinds of information in relation to the Data Subjects above:

- Name and contact details
- Employer / place of work
- Copies of insurance documentation, if applicable
- Bank details, if applicable
- Invoice amounts and payments
- Terms of business and similar agreements
- Notes on work undertaken
- Your relationship to one of our clients, if applicable

## Why do we process this information?

We will use the types of personal information specified above in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with our legal obligations.
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.

## Situations in which we will use your personal information

We need the categories of information in the list above primarily to manage our contracts with our suppliers. Where our supplier is an individual we process this data on the basis of Contractual Necessity – where the Data Subject is an employee of our supplier, our processing is on the basis of Legitimate Interest.

We also maintain records of our relationships with suppliers to comply with our legal obligations.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information on this basis are listed below.

- Processing your invoices to us and making payments
- Keeping records to detail work undertaken in compliance with client contracts
- As part of our internal financial management and planning
- Monitoring that our suppliers and contractors have adequate insurance cover in place.
- Keeping a roster of our preferred suppliers for future use.
- Keeping a database of our other business contacts to maintain appropriate records of our live relationships

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

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

### **Where did we collect this data from?**

We usually only collect information for Data Subjects directly. Where the Data Subject is the employee of one of our suppliers or business partners, they would normally have been held out to us as a point of contact.

We will only otherwise obtain data about you from the following sources:

- Your employer's website
- Your public social media profile
- A business partner who may have recommended you

We will also produce our own information in the categories above during the course of your engagement with us.

### **Are you under any obligation to provide the Personal Data?**

Where we process Personal Data to comply with our legal obligations Data Subjects must provide this information.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure our suppliers have appropriate insurance cover).

### **Who do we share this information with?**

We will share your personal information with other entities in our group ie those entities under the control of the Eacotts partnership as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We also use some third-party service providers who process data for us under strict instructions and under a binding contract ("Processors"). Our Processors provide the following services:

- Accountancy services
- IT services
- Web-based Customer Relationship Management software
- Cloud-based storage
- Outsourced HR
- Data Protection Consultancy
- Legal advisors

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **How long do we keep this information?**

We retain Personal Data in compliance with our Retention Policy and Schedule for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our Retention Policy and Schedule are available on request.

### **How do we keep this information secure?**

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

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

### **What rights do you have?**

Data Subjects are entitled to request that we erase, restrict, rectify or provide you with a copy of the data we hold, and may object to processing activities.

It is our policy to fulfil any such request within the statutory period of one month unless there is a compelling legal or contractual obligation which prevents us from doing so.

To make any such request please contact our officer responsible for data protection whose contact details are Jeffrey Smith, jeffreysmith@eacotts.com, Eacotts, Grenville Court, Britwell Road, Burnham, Bucks, SL1 8DF 01628 665432

You also have the right to lodge a complaint with the UK's data regulator, the Information Commissioner's Office. Visit [www.ico.org](http://www.ico.org) for more information.

### **Our contact information**

Eacotts  
Grenville Court  
Britwell Road  
Burnham  
SL1 8DF  
01628 665432  
[services@eacotts.com](mailto:services@eacotts.com)

### **Updates**

Eacotts will update this privacy notice to reflect any changes in our practices and services, as and when they occur. Any changes to our privacy notice will be notified on our website, and we will revise the "last updated" date at the top of the webpage.

If Eacotts make any material changes in the way we collect, use, and share personal data, details of these changes will be made to the privacy notice on the website. Eacotts recommend that you visit our website regularly to inform yourself of any changes in this privacy notice.