1.0 INTRODUCTION

Specialist Engineering Services Ltd (the Company) is committed to protecting your personal information and respecting your privacy.

This Privacy Notice explains:

- What personal data we collect about suppliers, customers and business contacts
- Why we collect and use that information
- The lawful basis for processing it
- Who we may share it with
- How long we retain it
- Your rights under UK data protection law

The Company processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and associated UK data protection legislation.

This Privacy Notice applies to:

- Supplier representatives
- Customer representatives
- Contractors and subcontractors
- Consultants
- Business contacts
- Prospective customers and suppliers

2.0 WHO IS RESPONSIBLE FOR YOUR DATA

The Company is the Data Controller for the personal data we hold about you. For any data protection enquiries, please contact:
Data Protection Officer
Emma Shrimpton
Email: emma.shrimpton@ses-esg.com
Telephone: 01302 756800
Address: SES House, Unit 3, Balby Court, Balby Carr Bank, Doncaster, DN4 8DE

3.0 THE INFORMATION WE COLLECT

We may collect, store and use the following categories of personal data:

- **Business Contact Information**
  - Name
  - Job title
  - Employer or organisation
  - Business address
  - Email address
  - Telephone numbers
  - Vehicle registration details (where required for site access)

- **Commercial Information**
  - Purchase orders
  - Invoices
  - Contract information
  - Correspondence and communications
  - Records of meetings and site visits
- **Financial Information where applicable:**
  - Bank account details
  - Payment information
  - VAT registration details
  - Sole trader information

4.0 HOW WE COLLECT YOUR INFORMATION

We obtain personal information from:

- You directly
- Your employer or organisation
- Contract and procurement activities
- Quotations and tender submissions
- Site visitor records
- Email correspondence and telephone conversations
- Publicly available sources such as company websites and Companies House records

5.0 WHY WE USE YOUR INFORMATION

We use your personal data for the following purposes:

- **Contract and Service Delivery**
  - Managing contractual relationships
  - Procuring goods and services
  - Delivering products and services
  - Managing projects and customer requirements
- **Financial Administration**
  - Processing invoices and payments
  - Managing accounts
  - Maintaining financial records
- **Health, Safety and Security**
  - Site access management
  - Contractor management
  - Security monitoring
  - Compliance with health and safety requirements
- **Legal and Regulatory Compliance**
  - Meeting legal obligations
  - Regulatory reporting
  - Fraud prevention
  - Managing insurance requirements
- **Business Operations**
  - Maintaining business relationships

- Supplier performance management
- Customer relationship management
- Protecting Company assets, information and systems

6.0 LAWFUL BASIS FOR PROCESSING

Where applicable, under UK data protection legislation, the Company may rely upon one or more of the following lawful bases:

- Contract - Processing necessary to fulfil a contract or take steps prior to entering into a contract
- Legal Obligation - Processing necessary to comply with legal requirements
- Legitimate Interests - Processing necessary for the legitimate interests of the Company, provided those interests do not override your rights and freedoms
- Consent - In limited circumstances where no other lawful basis applies

7.0 MARKETING COMMUNICATIONS

The Company may occasionally send business-related updates, service information or marketing communications where permitted by law. You may opt out of receiving such communications at any time.

8.0 WHO WE SHARE INFORMATION WITH

We may share personal information where necessary with:

- Professional advisers
- Accountants and auditors
- Insurance providers
- Regulatory authorities
- HM Revenue & Customs (HMRC)
- Law enforcement agencies
- IT and cloud service providers
- Customers, suppliers and contractors where necessary to support contractual obligations

Information will only be shared where there is a lawful basis for doing so and appropriate safeguards are in place.

9.0 INTERNATIONAL TRANSFERS

The Company does not routinely transfer personal data outside the United Kingdom. Where such transfers are required, appropriate safeguards will be implemented, including:

- UK adequacy regulations
- International Data Transfer Agreements (IDTAs)
- Other UK-approved transfer mechanisms

10.0 HOW WE PROTECT YOUR INFORMATION

The Company implements appropriate technical and organisational measures to safeguard personal data, including:

- Access controls
- Password protection
- Multi-factor authentication (MFA)
- Encryption
- Secure storage
- Cybersecurity monitoring
- Anti-malware protection
- Backup arrangements
- Secure disposal procedures
- Employee awareness training

Access to personal data is restricted to authorised personnel with a legitimate business need.

11.0 HOW LONG WE KEEP YOUR INFORMATION

The Company retains personal data only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, contractual, regulatory and business requirements.

Retention periods are defined within Company record management procedures.

12.0 YOUR RIGHTS

Subject to certain exemptions, you have the right to:

- Be informed about how your information is used
- Access your personal data
- Request correction of inaccurate information
- Request erasure of information where applicable
- Request restriction of processing
- Object to certain processing activities
- Receive your personal data in a portable format where applicable
- Challenge solely automated decision-making and profiling, however the Company does not make any decisions based on such processes.

13.0 SUBJECT ACCESS REQUESTS

You may request access to your personal information by contacting the Data Protection Lead (Business Services Director). Requests may be made verbally or in writing.

The Company will respond without undue delay and normally within one month of receiving a valid request.

14.0 DATA BREACHES

If a personal data breach occurs, the Company will investigate the incident and take appropriate action to reduce any risks to affected individuals.

Where required by law, the Information Commission and affected individuals will be notified.

15.0 COMPLAINTS

Individuals who have concerns regarding the processing of their personal information may raise this with the Data Protection Lead (Business Services Director).

Should an individual wish to make a data protection complaint:

- They may raise this with the Data Protection Officer (Business Services Director) verbally or in writing
- The Company will investigate without undue delay
- Complaints will be acknowledged within 30 calendar days
- The complainant will be kept informed of progress
- A written outcome will be provided
- Complaints will be logged and retained for monitoring purposes.

Where a complainant remains dissatisfied, they may refer the matter to the Information Commission using the contact details published on its website.

16.0 CHANGES TO THIS NOTICE

Privacy notices will be reviewed following legislative changes. The Company reserves the right to amend this Privacy Notice to reflect changes in legal requirements or business operations. The latest version will be made available upon request.