

1. Introduction

Ken Burrows Ltd is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

2. Who are we?

Ken Burrows Ltd is registered with Companies House, number 00789819. Our registered address is 40 Ogle Street, Hucknall, Nottingham NG15 7FR.

For the purposes of the GDPR, Ken Burrows Ltd is the 'controller' of the personal data you provide to us.

If you have any queries about this policy, the way in which Ken Burrows Ltd processes personal data or about exercising any of your rights, please send us an email to info@kenburrowsltd.com or write to Data Protection, Ken Burrows Ltd, 40 Ogle Street, Hucknall, Nottingham NG15 7FR.

Ken Burrows Ltd owns and operates www.kenburrowsltd.com. This policy, together with our terms of use and any other documents referred to therein, sets out the basis on which Ken Burrows Ltd processes personal data via our website.

3. What personal data do we collect?

We may collect and process the following personal data:

Information you provide to us:

If you:

- Complete a form on our website
- Correspond with us by phone, e-mail or in writing
- Report a problem
- Create an account with us
- Enter into a contract with us to receive products and/or services

We may collect your name, e-mail address, postal address, telephone number and job role.

4. Information we collect about you

If you visit our website, we may automatically collect the following information:

- Information about your visit to our website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page:
- Technical information, including the internet protocol (IP) address used to connect your computer to the internet, login information, browser plug-in types and versions, operating system and platform.



5. Information we receive from other sources

We may also receive information about you from your appointed representative, or employer when they register to receive services from us.

6. Information about other people

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisors or your suppliers, you must ensure they understand how their information will be used and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

7. Sensitive personal data

In certain limited cases, we may collect certain sensitive personal data from you (that is information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

8. How do we use your personal data

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of data is optional.

<u>Contract performance:</u> we may use your personal data to fulfil a contract, or take steps linked to a contract:

- To provide the products and/or services to you:
- To communicate with you in relation to the provision of the contracted products and services:
- To provide you with administrative support such as accounts, security and responding to issues:
- Provide you with industry information related to the products and/or services.

<u>Legitimate interests</u>: Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- Communicating with you in relation to any issues, complaints, or disputes:
- Performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns

<u>NOTE:</u> you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading of your rights.

<u>Where required by law</u>: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.



9. Who do we share your personal data with?

We take all reasonable steps to ensure that our staff are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- Legal and other professional advisors, consultants and professional experts:
- Service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

10. How long will we keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of six years following its termination or expiry, to ensure we are able to comply with any contractual, legal audit and other regulatory requirements, or any orders from competent courts or authorities.

11. Where do we store your personal data and how is it protected?

We store your personal data securely at the registered address in the UK. We take reasonable steps to protect your data from loss or destruction. We also have the procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username and password (or other identification information) which enables you to access certain services or parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website/Email: any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.



12. Your rights

Under the GDPR, you have various rights with respect to our use of your personal data (further information can be found in the Data Protection policy, section 9):

Right to access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 business days of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we were legally prevented from disclosing such information, or if your request is manifestly unfounded or excessive. We may charge a reasonable administrative fee to meet our costs in providing you with details of the information we hold about you.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us, using the contact details provided below, to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data. For example, the personal data is no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data be erased, please contact us using the details provided below.

Right to object

In certain circumstances you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the pressing of your personal data, please contact us using the details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data that we hold about you and we are verifying the information, you have objected to processing based on



legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data be provided to you, or another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data be ported to you, please contact us using the contact details provided below. Please note the GDPR sets out exceptions to these rights. If we are unable to reply to your request due to an exception, we will explain this to you in our response.

13. Contact

If you have any queries about this policy, the way in which processes personal data, or about exercising any of your rights, please send an email to info@kenburrowsltd.com or write to Data Protection, Ken Burrows Ltd, 40 Ogle Street, Hucknall, Nottingham NG15 7FR.

14. Complaints

If you believe that your data protection rights have been breached, and we have been unable to resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts. Please visit https://ico.org.uk/concerns/ for more information on how to report a concern to the UK Information Commissioner's Office.

15. Changes to our policy

Any changes we may make to our policy in the future will be posted on this page. Check back frequently to see any updates or changes to our policy.

This privacy policy has been ratified by the Directors of KBL limited:	Mr A Jackson, Director
	Mrs S Jackson, Director
	Mr R Kirk, Director
	24 th May 2018
Date of new review:	May 2020