

## **The Educational Facilities Management Partnership Limited “(EFM)”**

### **Privacy Statement**

***Please read this privacy notice as it describes what personal information The Educational Facilities Management Partnership Limited (“Us/We”) may hold about you, what it’s used for, and how it’s obtained. You should regularly review this privacy notice, as we may change it from time to time. If we make any significant changes, we will endeavour to send you an email to notify you of such changes, although this may not always be possible. Additionally, we will display a notice on our website to identify the changes being made.***

***If you have any questions about this privacy notice or do not agree with it, you can email [admin@efm-ltd.co.uk](mailto:admin@efm-ltd.co.uk)***

The regulations state that we can only use your personal information if we have a valid reason, known as a “lawful basis”, to use your information and we will only keep and use your information if we have one or more of the following reasons:

- To operate and administer our products and services.
- To administer payments to and from you.
- To comply with our legal obligations, to prevent financial crime including fraud and money laundering.
- To comply with our legal obligations and to enforce our legal agreements; to protect our rights, property or safety and that of our clients and others. This could include exchanging information with other companies for fraud prevention purposes or the prospective or actual acquirer of some or all of our business in the event that any part of our business were to be sold (information about clients and prospects will be a business event).
- For financial management and debt recovery purposes.
- To carry out market research and analysis to develop and improve our products and services.
- To market products and services to you from us or our partners.
- Maintain personal information requirements for business customers
- If you have provided consent for any other purpose.
- where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services.
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### **What kinds of personal information do we use**

We may collect and use a variety of personal information depending on the products and services we deliver to you. For all products and services, (in addition to your employer’s details) we may need to use your name, address and contact details.

For our employees this covers all information relevant to their employment by us.

In dealing directly with individuals we may need information to allow us to check their identity and information about their credit history. For some products and services we might need additional information, for example:

- information for, fraud prevention;
- information for, anti-money laundering; and
- to meet legal obligations.

(In the absence of that data we may not be able to supply some or all of our products or services).

### **Your online activities**

We do not use cookies to track your use of our website . (Please note that the provider of our website may use cookies: please see the privacy statement of Yell Business at the end of our site)

We may use the email address you provide to contact your business to provide further information on our services.

### **What information do we collect about you and why?**

The information we collect about you depends on who you are, and what your relationship with us is. The information we hold about you may have been provided by you or obtained from a third-party source.

**We provide professional services to other businesses, and as such, most of the information we collect relates to individuals in a professional capacity.**

The tables below list the personal information we collect, how we collect it, what we use it for, and our reasons for doing so. They are not exhaustive lists, and there may be instances where we need to collect and use your personal information for purposes which are not listed below.

Information we collect from our website or directly from you			
When do we collect your information?	What information do we collect?	What do we use it for?	Our reason(s)
When you use our website contact form to ask us a question or enquire about our services.	Name, Email address, Phone number, Company.	We will contact you to respond to your question or enquiry.	Legitimate interests - to respond to questions and enquires.
When you contact us other than through our website	Name, Email address, Phone number, Company.	to respond to your question or enquiry.	Legitimate interests - to respond to questions and enquires.

All other information			
When do we collect?	How is it collected?	What is it used for?	Our reason(s)
Candidates - contact details, CV and right to work documentation.	When you apply for a EFM job directly, or; When you apply through recruitment agency, or; When you are referred to us by someone else.	To recruit permanent and temporary EFM employees.	Legitimate interests – to recruit employees.
Clients - contact details.	We ask our clients to provide us with contact information in their organisations.	To contact our clients to discuss and manage our service.	Legitimate interests – so we can contact our clients.
Contractors - contact details, CV and birth certificate or passport details.	When you apply for a contract position directly with us, or; When you apply through a third party recruitment agency or; When you are referred to us by someone else.	To recruit for contract positions, and to manage active contractors.	Legitimate interests – contractor recruitment and contractor management.

Employees emergency contacts.	We ask all of our employees to nominate emergency contacts, such as relatives or close friends.	If any of our employees have an emergency, we will inform their nominated emergency contacts.	Legitimate interests – to fulfil our duty of care to our employees.
Prospective client contact details.	We identify and collect contact details for prospective clients using public sources, such as professional networking platforms and company websites.	We will contact prospective clients to discuss how our services can help their business.	Legitimate interests – to market our services to businesses.
Supplier contact details.	We ask suppliers to provide us with a contact in their organisation.	To contact suppliers who are working for us or are working for clients on our behalf.	Legitimate interests – so we can contact our suppliers.

### Who do we share your personal information with?

We may share your personal information with third-parties for a variety of reasons, depending on who you are, and your relationship with us.

No employee data is shared unless requested for legal, HMRC or other compliance reasons associated with their employment.

### How long do we keep your personal information for?

We keep personal information for different lengths of time, depending on what it is, and what we use it for. Here are our retention periods for commonly collected information.

- **Email addresses obtained via brochure downloads and question / enquiry forms** – We keep your business email address for as long as we believe you may be interested in our services for your business. Should you tell us that you are no longer interested in our services, we will add your email address to our blacklist, to ensure you do not receive further marketing communications from us. Alternatively, you can request we delete your email address altogether.

- **Candidate contact details, CV and right to work documentation** – We will keep your details for up to 3 years after your last contact with us, so we can contact you if we have any opportunities for you. If you become an employee, we will keep your data in line with the Employee Privacy Notice, which can be found on the company intranet.
- **Client contact details** – We will retain client contact details for the duration of our engagement, and then for as long as we believe is reasonably necessary, so that we can contact you about previous and future engagements.
- **Contractor contact details and CV** – We will keep your details for as long as we believe is reasonably necessary, so we can contact you to discuss previous, current and future contracts. We may also need to keep some information for up to 6 years for tax purposes.
- **Employees emergency contacts** – If you have been nominated as an emergency contact for one of our employees, we will keep your contact details for as long that employee remains in our employment. If you do not wish to be an emergency contact, you can ask us to delete your contact details.
- **Prospective client contact details** – We will keep your contact details for as long as we believe you may be interested in our services for your business. Should you tell us that you are no longer interested in our services, we will add you to our blacklist, ensure you do not receive further marketing communications from us. Alternatively, you can request we delete your contact details altogether.
- **Supplier contact details** - We will keep your details for as long as we believe is reasonably necessary, so we can contact you to discuss previous, current and future contracts.
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In some circumstances, we may need to keep your information for longer than stated above, such as, to comply with our obligations to the tax authorities, or for evidence in an ongoing legal claim.

### *What are your rights?*

This Data Protection Policy applies to personal data we process regardless of the media on which is stored or whether it relates to past or present employees, workers, customers, clients or supplier contracts, website users or any other data subject.

You have the right to object to how we use your personal information. If we have relied on consent to process your personal information

You can withdraw that consent at any time (this is discussed further below). You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else.

You have several rights with regards to your personal information (listed below). In accordance with data protection law, we will exercise requests within one month, except where the request is considered excessive.

To exercise any of your rights, please submit your request in writing by emailing:

admin@efm-ltd.co.uk

**Access to your personal information** – You can request a copy of your personal information.

**Change or correct your personal information** – If you believe the information we hold is incorrect or incomplete, you can request we change it.

**Request we stop using your personal information** – If you do not believe we are using your personal information fairly or lawfully, you can ask us to delete, or stop using your personal information.

In some circumstances we may not be able to delete your personal information (e.g. if it's needed to comply with a legal obligation). If we cannot delete your personal information, we will tell you why.

**Request we restrict the use of your personal information** - You can ask us to restrict the use of your personal information for the following reasons:

- You contest the accuracy of your personal information.
- You believe your personal information has been unlawfully processed, but you don't want us to delete your personal information.
- We no longer need your personal information, but you need us to keep it so you can establish, exercise or defend a legal claim.

Whilst use of your personal information is restricted, we will not use it for any other purpose.

**Withdraw consent** – If you have provided consent for any activities involving your personal information, you can withdraw consent at any time.

## *How to complain?*

If you believe we have used your personal information irresponsibly or unlawfully, you can email admin@efm-ltd.co.uk.

Should you wish to make a complaint to the Information Commissioners Office (ICO), you can do so by visiting <https://ico.org.uk/concerns/>.

Please note the following:

Our website may contain links to other sites of interest. However, once you have used these links to leave our sites, you should note that we do not have any control over those other sites. Therefore, we cannot be responsible for the protection and privacy of any information

which you provide whilst visiting other sites and such other sites are not covered by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the sites in question.