

# **Our Privacy Policy**

Hy Spec Services Limited ("HySpec") honours the right of its stakeholders, employees and other users', including website visitors, to privacy and data protection. HySpec is fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as Data Protection Act and EU GDPR.

This Privacy Policy ("Policy") describes how HySpec collects, uses, shares, and retains personally identifiable information.

The Policy is effective as of 24th May 2018 and will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of HySpec.

#### **Data Controller**

The Data Controller for all personal data collected is HySpec Management. This means that we are responsible for deciding what data we collect and how we hold and use your personal data. We will implement appropriate data security measures for protecting the data from unauthorised access and loss, as laid out in the Security section of this Policy.

#### **Data Collection**

HySpec collects and maintains a variety of personally identifiable information, including names, email addresses, phone numbers, payment information, social media profiles, business addresses, demographic information such as industry sector of the business and details of Chamber services the users may be interested in. The information could be collected through e-mails, phone calls, online enquiry forms and face to face meetings. HySpec does not collect personal data about individuals except when there is a legitimate business requirement or when such information is provided on a voluntary basis.

Users should also be aware that non-personal information and data may be automatically collected through the standard operation of HySpec's web servers, and by the use of cookies technology and/or Internet Protocol ("IP") address tracking. Non-personal identification information might include the browser used by you, the type of computer, the operating systems, the Internet service providers, and other similar information.

## **Purpose of Processing**

The personal data collected is used by HySpec to give you information relating to HySpec services, Client administration, prospecting new Clients, account management with existing Clients, to contact you to seek your views or comments on marketing communications on HySpec's behalf. The personal data held by HySpec may also be used on an aggregate basis without any personal identifiers to provide third parties with information, such as to help us develop new services and products, improve the features and content of the website or other marketing material, and to provide others with aggregate information about our services, website users and their usage patterns in relation to services and/or the website.

We also receive non-member data through networking (e.g. business cards, event registrations) and add these details, if relevant, onto our data management system.

#### **Data retention**

The personal data collected is stored in the HySpec management systems, both paper based and electronic.

Personally identifiable information will not be disclosed to any third party except if permission has first been obtained from the users. The data will not be transferred to any agency located outside the EU. At regular intervals, we will:

- review the length of time we keep your personal data for
- consider the purpose or purposes for which we hold your personal data for in deciding whether (and for how long) to retain it
- securely delete information that is no longer needed for that purpose or those purposes
- update, archive or securely delete information if it goes out of date.



## Security

HySpec uses reasonable measures to safeguard personally identifiable information. The implemented measures will be appropriate to the type of information maintained and compliance with all relevant legislation governing protection of personal information. Measures are implemented to preserve the confidentiality, integrity and availability of the personal information. 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 only those employees, contractors or agents who have a legitimate business need to have access to that data. The employees, contractors or agents will process your personal data in accordance with our instructions. They will be subject to a duty of confidentiality and due care with respect to handling the personal data. 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. HySpec's employees dealing with confidential/personal information are trained on data security and information protection.

## **Opt-Out**

HySpec for its legitimate business interests, must maintain contact information on its Clients, Employees, Subcontractors, and Suppliers to communicate information on events, training courses, policy and research and any other products or services. HySpec does not provide 3<sup>rd</sup> Parties with any personally identifiable information but may distribute the organisation's information on their behalf to those who may legitimately be benefited from receiving such information or have elected to receive such information. If you do not wish to receive promotional material, you may opt out by contacting hyspecservices@aol.com , hyspecservices@gmail.com or in writing to the address below.

#### Social media

If you send us a private or direct message via social media the message may be stored. Like other personal data, these direct messages will not be shared with any other organisations.

## **Access, Review and Correction**

The General Data Protection Regulations gives you the right to access your personal data held by us ("subject access request"). If you have an established business relationship with HySpec, you may request from us a list of the categories of personal information held about you. Subject access requests must be made in writing to the address below. We will respond to the request within a reasonable period and in any event within one month as required by the relevant provisions in the GDPR.

It is important that the personal data we hold about you is accurate and current. We will take all reasonable measures to ensure that the personal data we hold about you is accurate. We have also implemented procedures to enable you to review and correct your personal information, should there be any changes to your circumstances or errors in the gathered data. When you make a request to access or review the personal data we hold about you, we will request you to verify your identity before the request can be fulfilled.

## **Privacy Rights**

In addition to the rights of access, review and correction, you have the right to object to your personal data being processed for any particular purpose, or to request that we stop using your information. If you wish to exercise these rights, please email <a href="https://www.nyspecservices@gmail.com">hyspecservices@gmail.com</a> or send a letter marked "Data Protection" to Hy Spec Services Ltd, Unit 3 Meadowfield Industrial Estate, Cowdenbeath Road, BURNTISLAND, Fife, KY3 0LH.

If you have further concerns about how we use your personal data, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection authority for the UK. Please visit <a href="https://ico.org.uk/">https://ico.org.uk/</a> for more details on your data protection rights and how to contact them.

This privacy policy was last updated on 24th May 2018.

Signed: Position: Operations Director