

## McGreevy Engineering Privacy Policy

### Introduction

This Policy sets out the obligations of McGreevy Engineering Ltd ('the Company') regarding data protection and the rights of customers, suppliers and employees ('data subjects') in respect of their personal data under the General Data Protection Regulation ('the Regulation').

It is McGreevy Engineering's policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, suppliers, and others who share their personal information with us.

Please read this Privacy Policy carefully as it includes important information regarding your personal data and other information.

### General Principles of Data Protection

To ensure McGreevy Engineering's compliance with the General Data Protection Regulation, all personal data must be:

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- Accurate, and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### What information do we collect?

McGreevy Engineering collects personal information you provide us, which may include (but not be limited to);

- Personally identifiable (employee) information / HR records including; name, gender, date of birth, address, email address, phone number, national insurance

number, bank details, next of kin details, professional qualifications, disabilities, past employment data.

- Personally identifiable (supplier/customer) information including; name, company name, job title, address, phone numbers, email addresses, delivery addresses, bank details, accreditations, questionnaire/audit info.
- Personal details (including; name, email address and telephone number) are collected via our website when an enquiry is made.
- We may collect personal information at Trade Shows or during phone calls with supplier/customer representatives or when an enquiry is made via the telephone.
- If you submit to us any personally identifiable information in relation to another individual, you therefore represent that you have the authority to do so and permit us to use the information in accordance with this policy.

### **Why do we need personal information?**

McGreevy Engineering requires personally identifiable information for business-related purposes including actions such as (but not limited to):

- Communication with employees, suppliers and customers
- Customer/supplier account set up and administration
- Completion of supplier questionnaire
- Internal research and development purposes
- Manufacture and delivery/shipping of goods and services
- Invoicing and receipt of payment for goods and services
- Providing information about relevant products, services, and transactions e.g. pricing information, technical data, production information, or information about product or service improvements
- Meeting internal audit requirements
- Responding to questions or enquiries
- Consideration and response to job applications
- Action employee admin e.g. contract, payroll, pension, annual leave
- HR records are maintained within the Company to comply with our responsibilities under UK law, under Fair Employment legislation and to meet the requirements of Equal Opportunities. Details such as next of kin are kept on file to protect employees and for health and safety reasons
- Address legal issues e.g. complying with our obligations to retain certain business records for minimum retention periods; establishing, exercising, or defending legal claims; complying with laws, regulations, court orders, or other legal process; detecting, preventing, and responding to fraud, violation

of our contracts or agreements, violations of law, or other misuse of our products or services

### **What basis do we have for processing your personal data?**

McGreevy Engineering will only collect and process personal data where at least one of the following applies;

- The data subject has given consent to the processing of his or her personal data;
- Processing is necessary for the performance of a contract to which the data subject is a party e.g. processing details in order to affect payment or in order to take steps at the request of the data subject prior to entering into a contract;
- The data is required for legitimate business interests e.g. monitoring staff access to systems and downloads;
- Processing is necessary for compliance with a legal obligation to which the controller is subject.

### **When do we share personal data?**

McGreevy Engineering will treat personal data confidentially and will not disclose or share it with other parties, unless we advise you of the necessary nature of this. Information will only be used to conduct all normal business operations.

### **Where and how do we store, process & secure personal data?**

McGreevy Engineering will not store or process its data outside the European Economic Area. All personal data is held securely (password protected) on the McGreevy Engineering server and any hard/paper copies are held securely on the premises.

These procedures are used to protect personal information and;

- to protect data against accidental loss
- to prevent unauthorised access, use, destruction or disclosure
- to ensure business continuity and disaster recovery
- to restrict access to personal information

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

McGreevy Engineering will keep personal data no longer than is necessary for the purposes for which the personal data is processed. As a general rule, McGreevy Engineering will hold supplier/customers details for a maximum of 7 years, once any trading has ceased. When leaving the Company, an employee's personal details will be deleted six months (maximum) after they have terminated their contract. McGreevy Engineering will securely dispose of data after it is no longer required. All relevant files held on the server will be deleted and any hard copies will be shredded on site.

McGreevy Engineering will keep any data:

- for the least amount of time that we can
- in accordance with the requirements of our business
- stored securely while it is in our possession
- until it reaches the appointed deletion time

McGreevy Engineering's policy for retention of data is that any information held is for the purposes of live/current/future business and also for employees currently employed by and under contract by the company.

## Your rights in relation to personal data

McGreevy Engineering respect the right of individuals to access and control their personal data. An individual's rights include;

### Right to be informed

- Individuals have the right to be informed about the collection and use of their personal data. Specific privacy information can be provided regarding:
  - our business
  - the data processing activities we carry out
  - the length of time we will keep the data
  - the rights available to you in respect of processing
  - the right to lodge a complaint
- Privacy information will be provided to data subjects:
  - at the time we collect their data
  - in a concise, transparent, intelligible and easily accessible way
  - in clear and plain language
  - free of charge

### Right of access

Under the GDPR, individuals have the right of access to their personal data. If required, McGreevy Engineering will freely give individuals:

- confirmation of whether we are processing your data
- other supplementary information (including mandatory privacy information)

- a copy of the personal data being processed

McGreevy Engineering will comply with a subject access request within one month of receipt, unless under specific circumstances.

#### Right of rectification

Individuals can ask data controllers to erase or rectify inaccurate or incomplete data. By law, McGreevy Engineering will comply within one month with such requests.

#### Right to erasure

Individuals have the right to ask McGreevy Engineering to delete their personal data if:

- we have processed your data unlawfully
- we no longer need the data for the original purpose (and we have no new lawful purpose)
- we rely on consent for processing and you withdraw it (and there are no other legal grounds you can apply)
- you exercise your right to object to processing, an objection which we cannot override
- erasure is necessary for compliance with other EU or national law

#### Right to restrict processing

Individuals can ask McGreevy Engineering to restrict processing their personal data if, for example:

- you believe your data is not accurate (McGreevy Engineering will stop processing until you verify the accuracy of the data)
- the processing is unlawful, but the individual doesn't want the data erased
- we no longer need the data, but the individual needs it to exercise a legal claim
- we are taking steps to verify overriding grounds in the context of an erasure request

If McGreevy Engineering are asked to restrict processing, we will be allowed to store the data, but won't be able to carry out any processing.

## How to contact us?

If you have questions or concerns about McGreevy Engineering's privacy practices, your personal information, or if you wish to file a complaint, please use the contact details below;

McGreevy Engineering Ltd  
Maryland Industrial Estate  
Ballygowan Road  
Belfast  
BT23 6BL

(028) 9044 8755

[www.mcgreevyengineering.co.uk](http://www.mcgreevyengineering.co.uk)

Data Controller;

Aaron McGreevy

[aaron@mcgreevyengineering.co.uk](mailto:aaron@mcgreevyengineering.co.uk)

## Changes to our Privacy Policy

Changes to this Privacy Policy will be posted on the McGreevy Engineering website, along with information on any material changes. McGreevy Engineering reserves the right to update or modify this Policy and any Specific Privacy Statements at any time and without prior notice. This Policy was last revised in September 2018.