



## **PRIVACY NOTICE**

### **Background**

Redwing Solutions Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of potential and actual customer's data and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### **Information About Redwing Solutions Ltd**

- Registered in England and Wales Company Registration No. 5415902.
- Registered Address: 12 Hennals Avenue, Webheath, Redditch, Worcs. B97 5RX.
- Trading from 5 Pound Court, Weights Farm Business Park, Weights lane, Redditch, Worcs. B97 6RG.
- Data Protection Officer: Imogen Edmunds, Managing Director. Email address: [imogen.edmunds@redwing-solutions.co.uk](mailto:imogen.edmunds@redwing-solutions.co.uk) Telephone number: 01527 306066.
- Imogen is a member of the Chartered Institute of Personnel & Development, Chartered FCIPD.

### **What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details towards the end of this policy.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us utilising your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

### **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us:

- Name;
- Date of birth;
- Gender;
- Address;
- Home address;
- Email addresses;
- Telephone numbers;
- Business name;
- Job title;
- Sickness absence information;
- Disciplinary investigations and hearings;
- Capability investigations and hearings;
- Grievance investigations and hearings;
- Performance appraisal information;

Your personal data may have been passed to us by your contacts and people in your network. We will never sell your data.

### **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supporting you as a customer with the HR management of your employees.
- Supplying our products and services to you. Your personal details may be required in order for us to enter into a contract with you.

- Thanking you – we may use your personal data to send you a gift or a thank you through the post.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and or post that you have opted-in to (you may unsubscribe or opt-out at any time by using this link).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and post with information, news, and offers on our products and services.

You will not be sent any unlawful marketing or spam.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

### **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

Your personal data will therefore be kept for the periods stated in our Data Retention Policy (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- The period time to which an employee can take legal action against an employer, whether this be 90 days, 6 months, 12 months or 6 years.
- After we have finished being your supplier, we keep your records for 12 months and then they are deleted or shredded.

### **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA.

This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- We have a locked office, with locked filing cabinets.
- We use a CRM.
- We use both personal shredders and the services of Shred Pro who visit the office and shred our waste in their vehicle on our car-park.
- We save our files on the cloud in Office 365 and pay for back ups.
- We use recorded first class post.
- We scan and email documents with password protection where deemed appropriate.
- We encourage customers to send us anonymised data where possible.

## **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings, or if your employer is involved in legal proceedings, or complying with legal obligations, such as a court order, or the instructions of a government authority.

## **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data. You will then be supplied with a copy of it (where any such personal data is held).

This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown towards the end of this policy.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days, in any case, not more than one month of receiving it.

Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details and mark the letter for the attention of Imogen Edmunds, Managing Director.

- Email address: [imogen.edmunds@redwing-solutions.co.uk](mailto:imogen.edmunds@redwing-solutions.co.uk)
- Telephone number: 01527 306066
- Postal Address: Redwing Solutions Ltd, 5 Pound Court, Weights Farm Business Park, Weights Lane, Redditch, B97 6RG

## **Complaints**

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website: <https://ico.org.uk/concerns>

## **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.