



**Shredall (East Midlands) Limited**

**Privacy Notice – 22 May 2018, V2**

**[Min Review: Annual]**

## **Introduction**

Shredall (East Midlands) Limited, as a provider of document and data management services, has long understood and appreciated the trust placed in us when sharing personal data – and security of that personal data is important to us.

This document clarifies how we collect, use and protect your personal data.

Your rights in respect of your personal data and how you can exercise them are also explained.

## **Who are we?**

We are Shredall (East Midlands) Limited. This is our registered company name, although we have a small number of trading styles such as Shredall SDS Group, Shredall, Shredall Scotland and SDS.

As data controller, Shredall (East Midlands) Limited determines what data is collected by the business, how it is used and how it is protected.

Our registered address is Joy House, Bestwood Business Park, Park Road, Bestwood Village, Nottingham NG6 8TQ.

You can contact us by post at the above address, by email at [dataprotection@shredall.co.uk](mailto:dataprotection@shredall.co.uk) or by telephone on 0115 9777320.

Our Data Protection Officer, or DPO, is Carole Woolhouse – also contactable as above.

### **Policy Scope**

This privacy policy covers Shredall (East Midlands) Limited, including our website: [www.shredall.co.uk](http://www.shredall.co.uk)

It also covers any personal data we may collect via online web applications as part of contractual fulfilment, and any personal data that may be collected through our website, by telephone or via social media.

### **Collection of Personal Data**

This is for one of more of the following purposes:

1. Provision of requested information or information we believe may be relevant to a subject in which you have previously expressed an interest
2. Process of completion of commercial transactions between the organisation that you represent, or with you individually, for the purchase of services, and us.
3. Fulfilment of a contract between Shredall (East Midlands) Limited and the organisation that you represent, or with you individually
4. Ensuring the security and safe operation of our website and business infrastructure
5. Communications management between Shredall (East Midlands) Limited and you.

The following section (Lawful Basis) provides more detail on these purposes, including our lawful basis and records/data retention periods.

To facilitate use and navigation of our website, some technical information may be collected, and our cookies policy is also available as part of our 'website privacy policy'.

Your rights in respect of personal data collected and how you can exercise your rights are discussed below in the relevant section (Your Rights).

### **Lawful Basis for Processing of Personal Data**

Our business architecture, including accounting and systems infrastructure and compliance arrangements is such that personal data is processed on a company-wide network. Processes are in place to limit access to data to those who need it as part of their job role. Some data may be shared with third parties, as set out below.

Where we process on the lawful basis of legitimate interest, we have looked for appropriateness (purpose, necessity, balance).

*Please see Annex A.*

### **Storage of Personal Data**

Shredall (East Midlands) Limited is a UK organisation.

Our website is hosted in the EU, accessible by staff based in the EU. We have appropriate contractual and security measures in place protecting personal data.

Our CRM, marketing, HR and accounting system is EU-based.

Where we adopt the SaaS business model (Software as a Service) as part of our processing environment - unless stated otherwise, we are the data controller in respect of SaaS providers.

Payment processing and banking is EU-based.

We deliver document and data services across the UK and mindful of logistics and commercial viability sometimes use sub-contractors (sometimes known as sub-processors). We have sub-contractor agreements in place addressing legal and security requirements.

Our IT/Network is managed by a UK IT Managed Service Provider and this may mean access to information in respect of data subjects such as customers or employees.

Our Records/Data Retention Policy covers digital and paper-based data (see Annex A for more detail).

### **Our Security Measures**

Shredall (East Midlands) Limited has implemented an information security management system (ISMS) – certified to ISO 27001 since 2015. We also hold Cyber Essentials and our payments card processing is covered by appropriate PCI DSS compliance.

You will also see that industry codes of practice BS EN 15713 (secure destruction of confidential material) and BS 7858 (security screening of individuals employed in a security environment) are included in the scope of our ISO 9001:2015 certification.

We therefore believe that we have put in place appropriate controls for the protection of personal data, with risk assessment at the core of our ISO 27001 ISMS – and other management systems.

*Note of caution:* Information security risks exist beyond the perimeter of our information infrastructure and you should prioritise appropriate safeguarding of your own information. We cannot be held liable for breaches beyond our own control.

### **Your rights as a data subject**

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.

If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.

If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.

You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above in the [Who Are We](#) section of this policy.

### **Your right to complain**

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint.

However, you can also contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **Updates to this privacy policy**

We regularly review and, as appropriate, update this privacy policy from time to time, mindful that our services, use of personal data and expertise evolves.

If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed and ensure that it readily available to you through multiple routes, including on request from [dataprotection@shredall.co.uk](mailto:dataprotection@shredall.co.uk)

**ANNEX A**

Purpose of collection	Info category	Data collected	Processing – how used	Lawful basis for processing	How shared	Retention
Service information	Service Type	Via website or other forms, e.g. name, email, company name, address, etc (often multi-site)	Provision of digital information about services you have requested	Contractual	Internal	Contract duration
		Ditto	Provision of further digital information & news updates in relation to the info category	Consent	Internal	Renewable annually
		Customer Set Up, e.g. name, email, company name, address, etc (often multi-site)	Provision of further digital information & news updates in relation to the info category	Legitimate interests	Internal	Contract duration
		Telephone	Used to follow	Consent	Internal	Renewable

		number	up – i.e., that the info meets needs & requirements			annually
Transactions information	Payment details	E.g., name, address, email, etc	Order processing; accounting & tax; contractual/legal issues	Contractual; Statutory; Legitimate interest	Internal; Internal & professional adviser/s; Internal & professional adviser/s	6 years from start of contract; 8 years - VAT records; 6 years from start of contract
	Payment card data	PAN, cardholder data, etc	Order processing – payment by purchase cards	Contractual	Internal – Sage Pay	Only retained during authorisation pending
Fulfilment information	Fulfilment data	E.g. name(s), address(es); email(s), etc	Delivery of Shredall SDS Group services, physical or digital, as purchased	Contractual	Internally & any third-party supplier (e.g. sub-processor) with whom we contract to fulfil contractual requirements	6 years from start of contract
Security	Security information	Technical information +	Protection of our IT network,	Legitimate interest	Internally – and at a	Best Practice, e.g. CCTV



			website and infrastructure – from cyber or physical threats; and for reporting/action in respect of illegal acts		forensic level with our IT MSP and applicable Authorities	images (31 days – BS EN 15713, 90 Days – NAID AAA); As required for Reporting - Authorities
Communications	Contact Information	E.g. name(s), contact details, etc	To stay in touch on matters raised by you or on-going interaction including, for example, customer satisfaction.	Legitimate interest	Internally & externally with professional advisers	Best Practice e.g. ISO 9001; Complaints or Reporting - Authorities