

Privacy Notice for Website and Digital Platform Users

V3.0 August 2022

PRIVACY NOTICE

About this privacy notice

The NG Bailey group of companies, which includes NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited, The Freedom Group of Companies Limited, Denton Hall & Estate Limited and NGBF Holdings Limited ("we", "us", "NG Bailey") takes the protection of your personal data very seriously and is committed to Data Protection and Information Security in accordance with the UK General Data Protection Regulation ("UK GDPR").

This privacy notice explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

Please note that our website and other digital platforms may contain links to third-party websites/digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of each and every other website/digital platform that you visit.

We may update this notice at any time, which will be available to view in its latest form on our website <u>www.ngbailey.com</u> or, on request to <u>data@ngbailey.co.uk</u>.

Information about you

This privacy notice applies to any personal information which you give to us ("personal data") via the NG Bailey website located at www.ngbailey.com (or www.ngbailey.co.uk) and other digital platforms used by us.

The information about you is known as 'personal data', such as your name, address, e-mail address and telephone number, and may include what the UK GDPR defines as 'sensitive personal data', which is biometric data collected on CCTV footage or other electronic means such as photographs or swipe cards and information about health, sexual orientation, trade union membership, religious or other beliefs, racial/ethnic origin or criminal convictions or proceedings.

When using the NG Bailey website or other digital platforms used by us you will encounter areas such as contact, enquiries, feedback, registration and newsletter sign-up forms. In order to use these services, you may be asked to enter personal data (but not limited to) such as your name, organisation, address, e-mail address and telephone number.

By using this website or other digital platforms used by us and entering your personal data, you consent to us collecting and using your personal data in accordance with this privacy notice.

How we use your information and why?

When you provide personally identifiable information to us, we use it solely for the purposes for which it was provided, in accordance with this notice.

Due to the nature of our operations we may disclose and share personal data with other NG Bailey companies who may jointly process such information for the purposes described in this notice.

Any personal data relating to you that we collect will be used and recorded by us in accordance with current data protection legislation and this privacy notice. We will use your personal data mainly for record-keeping purposes and in order to provide and improve our services and products. This may involve us sending you information about us, our affiliates and associated companies and organisations including but not limited to promotional and/or marketing material about our products, services and offerings.

We may also create an individual profile for you so that we can inform you of services, products, events or special information that may be of interest to you. We may use your personal data to analyse customer/user behaviour and characteristics in order to measure interest in, and use of, the various areas of the website with a view to improving and/or altering the website and/or provide and improve our services and products. We may provide only aggregated (and therefore anonymous) data to third parties for this purpose (if applicable).

If you provide personal data for the purpose of job opportunities with NG Bailey your data will be shared with other parties and your data may also be used to notify you about other/future job opportunities.

In order to assist us in processing your personal data, we may engage with third-party companies that provide us with services that can assist us in doing so. Where your data is processed in this manner, you will see additional data protection notices accordingly.

Categories of personal data include; name, organisation, email, contact number and details of your enquiry or feedback.

Who we share information with

For the purpose of providing our services to you we may share your personally identifiable information with:

Organisations which provide a service to us or act on our behalf, on the understanding that they will keep the information confidential, for example, our IT providers, accountants and other technical experts and other parties if your application is for a role in one of our partnerships. If they are located in another country (which may be outside the European Economic Area) we will make sure that they agree to apply the same levels of protection that we are required to apply to information held in the UK and to use your information only for the purpose of providing the service to us.

Any third party to whom we have a duty to do so in order to satisfy any legal or regulatory requirements, such as the Solicitors' Regulatory Authority, the Legal Ombudsman, HMRC and HM Courts and Tribunal Service as examples.

Our policy is not to share personally identifiable information with third parties, unless required by law, as required to perform our obligations to you or as necessary as described above.

NG Bailey's assurance to you

All information that is obtained about you will be processed by NG Bailey in accordance with UK GDPR and shall only be processed by individuals within NG Bailey or its appointed third party providers or other representatives as explained in this notice, as required by law, as required to perform our obligations to you, or as is strictly necessary.

All our third-party service providers and other representatives are required to take appropriate security measures to protect your personal information in line with UK GDPR. We do not allow our third-party service providers to use your personal data for their own

purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

NG Bailey may transfer personal data to locations outside the European Economic Area ("EEA"), for example, to service providers. If this occurs, NG Bailey will take steps to ensure that the confidentiality and security of your personal data is protected.

Your rights

Under the UK GDPR, you have a number of 'rights', to ensure that your personal information is being managed appropriately. Specifically, you have the right:

- To be informed (about the processing of your data)
- Of access (to the information we hold)
- To rectification (of any errors on the information we hold on you)
- To erasure (of information we hold, following the statutory period for which we are obliged to hold data)
- To object (to the ongoing processing of information)
- To be aware of any processing where automated decision-making and profiling (using your information) takes place
- To ask us to transfer the information to another organisation.

You have a right to exercise these rights at any time (see our contact details below).

You also have the right to object to your data being used for direct marketing purposes, and you can be removed from our marketing database at any time by clicking 'unsubscribe' at the bottom of our e-bulletins or by writing to us by email or mail (see our contact details below). Please note, however, that if you do opt out we (and/or they) will be unable to keep you informed of new services, products, events or special information that may interest you.

Cookies

In common with many other website operators, we may use standard technology called "cookies" on this site. "Cookies" are small text files a website can use to recognise repeat users and to allow us to observe behaviour and compile aggregate data in order to improve the site and to target its marketing efforts. Our cookies enable us to identify you and to store information about the services and information you select between visits. Cookies do not attach to your system nor damage your files. Most browsers automatically accept cookies, but you can usually change the settings on your browser to prevent cookies being stored. However, if you do turn cookies off this will limit the service that we are able to provide you with.

Your confirmation to NG Bailey

You confirm that all personal information you provide to us is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

If you provide NG Bailey with information about a third party e.g. your employees, you confirm that they have appointed you to provide the information and to consent to the processing of their personal data, and that you have informed them of our identity and the purposes for which their personal data will be processed.

Security Measures

Whilst we will ensure that security measures are put in place to protect the personal data you provide, you should remember that concerns still exist in relation to the general security of the internet and by using this site you accept that we will not be held responsible in the event of a breach of security unless this is due to our negligence or wilful neglect.

How long we hold this information

The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law, or until such time that you wish to 'unsubscribe' request for your information to be erased.

Details of retention periods for different aspects of your personal information are available in our Document Retention and Destruction Policy which is available via our electronic Quality Management System held on our intranet or, on request, to <u>data@ngbailey.co.uk</u>.

Who should you contact and where to make a complaint

If you have any questions about this privacy notice and how your information is handled or if you wish to exercise any of your rights in respect of your personal data you should, in the first instance, contact <u>data@ngbailey.co.uk</u> or alternatively write to Data, NG Bailey, Denton Hall, Ilkley, West Yorkshire, LS29 0HH.

If you prefer to speak directly to the Information Commissioners Office (ICO) then they can be reached at <u>www.ico.org.uk</u>

If you have a complaint regarding any aspect of your personal data or this privacy notice, please email <u>data@ngbailey.co.uk</u>. Alternatively, or if you are still not satisfied with the outcome of your complaint to us, you may write to the Information Commissioner's Office at the following address:

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

Helpline number: 0303 123 1113

You can also contact the Information Commissioner's Office using their online form: <u>https://ico.org.uk/global/contact-us/email/</u>

	Last amended	Author	Action taken
1.0	April 2018	Gary Hibberd	Document created
2.0	July 2020	Martin Jordan	Document review and update
3.0	August 2022	Emma Judge	Document review, reformat and update

Version Control