

Scattergoods Agency Ltd

Online Privacy Statement

Scattergoods Agency Ltd collects various kinds of personal data in the day-to-day running of our business and it is our aim to uphold the absolute highest standards when handling your personal information. For the purposes of this policy we are a “Data Controller”, which means we are in a position to make decisions about the processing of data we hold about you, the “Data Subject”.

This is our Privacy Statement for online users: those who visit our website, complete our client inquiry form or fast-track application form, and who we correspond with by email.

Our Approach to the GDPR

We follow the principles of the General Data Protection Regulation (GDPR), under which the law requires us to process data fairly; for specified purposes; limited to what is necessary and for as long as necessary; and to ensure data is accurate and secure.

We consider good data protection to be crucial in building positive working relationships, so we never collect data or process any data in a manner which we think would surprise people, and hope to exceed expectations in transparency about our data processing.

We always carefully consider our legal bases for processing under the GDPR for every single item of data we collect, and we make every effort to only process data when we absolutely must to comply with our legal and contractual obligations, and when we are satisfied that it is necessary for our business to function.

We take measures to keep data secure and protect against unauthorised access, and we take particular care before collecting and holding any data that could adversely affect your rights and freedoms or cause you loss or other damage.

General Web Users

For those who visit our website we capture their IP addresses and metadata to produce anonymised web analytics to assess the effectiveness of the website. Our website uses two cookies embedded by Google Analytics for this purpose only.

We process this information to enable the operation of our website and test its effectiveness as a marketing tool. We do not process this data in combination with any other data to build profiles of our web users.

We process this data for our legitimate interest in operating an effective website and marketing suitable goods/services to existing or potential customers.

We do not collect or use any other information about your web use to profile or track you.

Contact Forms

When users fill in our Client Enquiry form we only collect the data they enter and do not combine it with any other form of data.

We use this information to market suitable goods/services to potential clients and do so on the basis of consent.

Email Correspondence

We process names and contact details from emails, together with any other Personal Data provided in the body of the email, for the purposes of our legitimate interest of maintaining adequate correspondence with our clients, service users, employees and anyone else we may communicate with.

Those who email us should refrain from sharing the personal details of others without that person's permission, and any such information shall be processed under Article 14.5 of the GDPR, absolving our obligation to contact every Data Subject mentioned to us due to the disproportionate effort required.

Who do we share this information with?

We only transfer the Personal Data we control to third-party Processors for specified purposes, under strict instructions and with the assurance that appropriate measures are in place to protect your information. Our third party processors include:

- Outsourced IT services who have access to our systems for backup and restore purposes.
- Services for the operation of our website and email.
- External marketing provider

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

We will not transfer your personal information outside the EU.

We will never share the personal data of our contacts with any marketing organisation or other third party who we have not outlined above. If this ever changes we will seek the express consent of the Data Subjects concerned.

Will the information be used for automated decision making or profiling?

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

How long do we keep this information?

We retain Personal Data in compliance with our Retention Policy and Schedule for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our Retention Policy & Schedule is available at www.scattergoods.co.uk.

We retain and process personal data for which we have your consent unless and until you chose to withdraw your consent.

How do we keep this information secure?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. 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.

What rights do you have?

Data Subjects are entitled to request that we erase, restrict, rectify or provide you with a copy of the data we hold, and may object to processing activities.

If we process Personal Data on the basis of Consent, the Data Subject may withdraw their Consent in respect of the particular processing activity at any time.

It is our policy to fulfil any such request within the statutory period of one month unless there is a compelling legal or contractual obligation which prevents us from doing so.

To make any such request please contact our officers responsible for data protection:

- **Karen Elson** – karen@scattergoods.co.uk – 01483 461963
- **Darren O’Leary** – darren@scattergoods.co.uk – 01483 461950

You also have the right to lodge a complaint with the UK’s data regulator, the Information Commissioner’s Office. Visit <https://ico.org.uk/> for more information.

Our contact information

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