

Scattergoods Agency Ltd

Privacy Statement – Clients

The information we collect about you is processed in line with the General Data Protection Regulation and our Data Protection Policies.

This Notice is for Data Subjects and is therefore applicable to clients who are natural persons and to natural persons whose details are provided to us (e.g. as a point of contact).

This Privacy Notice is in compliance with our duty to inform Data Subjects of our processing activities.

What categories of Personal Data do we process?

We process the following kinds of information in relation to these Data Subjects above:

- Full name and contact details
- Job title / position
- Employer name
- Signature
- Place of employment
- Bank details
- Terms of business
- General correspondence
- Invoice amounts and payment history
- Statements of account
- Invoices
- Credit check information

Why do we process this information?

We will use the types of personal information specified above in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with our legal obligations.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

We need the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

In some cases we may use personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Determining the terms on which we offer services
- Issuing refunds to you where appropriate
- Administering the contract we have entered into with you
- Business management and planning, including accounting and auditing
- Making arrangements for our working relationship and the provision of services to you
- For finance administration and record keeping
- Dealing with legal disputes involving you
- To prevent fraud
- To conduct data analytics studies to review and develop our services
- To comply with the Conduct of Employment Agencies and Businesses Regulations 2003

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may use the basic contact information of our existing clients to contact them to market our services, which qualifies as a legitimate interest under the GDPR and we do not therefore consent to this kind of marketing.

Where did we collect this data from?

Unless indicated below, the Personal Data was collected from the Data Subject.

The source for any Personal Data not collected from the Data Subject:

- Our client (i.e. contact information where client is a limited company and Data Subject is an employee)
- Credit check information

Are you under any obligation to provide the Personal Data?

Where we process Personal Data to comply with our legal obligations Data Subjects must provide this information. When Personal Data is processed because of a contractual necessity, it will be impossible to provide the service/s without this information.

Who do we share this information with?

The following activities are carried out by third-party service providers: IT services, outsourced HR and data protection consultancy, legal advisors and accountancy services.

All our third-party service providers and other entities in the group 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.

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.

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 and Schedule are available www.scattergoods.co.uk.

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.

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.

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 461 963
- **Darren O’Leary** – darren@scattergoods.co.uk – 01483 461 950

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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