

Private Supplier Privacy Notice

(Information Commissioners Office reference number Z7425604)

Data controller: Fairhurst

As part of its operational procedures relating to its daily business, Fairhurst collects and processes personal data relating to private suppliers. Fairhurst is committed to being transparent about how it collects and uses that data and to meeting its General Data Protection Regulation (GDPR) obligations.

What information does Fairhurst collect?

Fairhurst may collect a range of information about you. This may include:

- your name, address and contact details, including email address and telephone number;
- details of your insurance policies;
- your bank details.

Fairhurst may collect this information in a variety of ways. For example, data might be obtained from the information you provide in order for Fairhurst to engage you by purchasing goods from you or by way of invoices you submit for services rendered and/or goods supplied to Fairhurst.

Personal data will be stored in a range of different places, including Fairhurst's approved supplier database, records of your invoices and on other IT systems (including email).

Why does Fairhurst process personal data?

Fairhurst needs to process your personal data during assessment of your proposal and internal audit checks in order to include you as an approved supplier of services and/or goods. It will also need to process your data in order to enter into a contract with you for the supply of your services and/or goods.

Fairhurst has a legitimate interest in processing personal data, both during the period you are supplying your services and/or goods to Fairhurst and thereafter during yours and Fairhurst's contracted periods of liability (whichever is the longer) associated with those services and/or goods. Processing your data allows Fairhurst to manage the supply of your services and/or goods.

Who has access to data?

Your information may be shared internally for the purposes of managing the various projects for which you may have provided services or for the recording of any goods you may have supplied and for the purposes of making payments for those services and/or goods provided. This includes members of the Fairhurst technical team, administrative staff and IT staff so far as access to the data is necessary for the performance of their roles.

Fairhurst will not share your personal data with third parties, unless our project works related to any services you provide to us necessitate this. Fairhurst will then share your data with, for example, our professional indemnity insurers.

It is our intention, wherever possible, to use and store your personal data in the UK and to avoid transferring it outside of the European Economic Area (EEA). Personal data shall not be transferred to a country or territory outside the EEA unless an Agreement or other mechanism approved by the European Commission or the Information Commissioners' Office has been put in place.

How does Fairhurst protect data?

Fairhurst takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does Fairhurst keep data?

Fairhurst will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, , for as long as we are required to keep it by law or regulatory requirements and as set out in this privacy notice during our contracted period of liability.

Automated decision-making

Automated decision-making does not form any part of the processes that Fairhurst will employ in the fulfilment of the contract that exist for you to provide services and/or goods to the firm.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Ordinarily, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you believe that Fairhurst has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Fairhurst during the period of your project works. However, if you do not provide the information, Fairhurst may not be able to carry out your project works properly or at all.

If you have any questions about this privacy notice, please contact the Fairhurst office which has engaged you to deliver services.