



Privacy Policy

Equipmake Limited, a company registered in England and Wales under No. 03402844 of Unit 7, Snetterton Business Park, Snetterton, Norfolk, NR16 2JU. (referred to as “we”, “us”, or “our”) is committed to protecting the privacy and security of all the information we hold. It is very important to us to ensure the personal information you provide to us is treated with the utmost respect and your data privacy rights are safeguarded.

Our Privacy Policy explains how personal information about you may be collected, what we do with your data, the measures we take to keep it secure, as well as the rights and choices you have over that personal information. This Notice applies to the personal data of all employees, jobseekers, contractors, clients and suppliers and other people whose details we need to process in the course of carrying out our business.

In the course of running our business and as an employer we will process your personal information either as a Data Processor or Data Controller, at all times in accordance with and subject to current UK Data Protection laws.

1. What is personal information?

Under current Data Protection rules, “personal information” means information relating to an identified or identifiable individual.

Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, or data concerning health, sex life or sexual orientation is “special category personal information”.

2. How we use personal information

Under data protection laws, we can only use your personal information if we have a lawful reason for doing so. This can be:

- To comply with our legal and regulatory obligations; or,
- For the performance of our contract with you or to take steps at your request before entering into a contract; or,
- For our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests; or,
- Where you have given consent.

3. How we collect personal information

We will collect personal information directly from you in person, by telephone, text or e-mail. We may also collect information from publicly accessible sources, or directly from a third party, or from a third party with your consent, from cookies on our website, or from our IT systems, including our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

4. Personal information we collect and our lawful reason for doing so

We will only collect information that we know we will genuinely use and that we have a lawful reason to process that data. Personal information is required to provide you with our products and/or services, or for recruitment or employment purposes. If you do not provide personal information we ask for, it may delay or prevent us from being able to do so lawfully or efficiently.

The type of information we may collect, and use, includes:

For job seekers

- Your name and contact information, including email address and telephone number
- Images of you, including any public social media material
- Information to enable us to check and verify your identity and immigration status, that may include your nationality, citizenship, Birth certificate/passport/visa information, or Identity card
- Education, qualifications, certificates, and employment history
- Where it's a requirement of the job, your Driving Licence
- Details of any unspent convictions, or spent convictions where it is a requirement that you declare it for specific roles you are applying for
- Third party contact information, specifically your referee details
- We may also collect other information about you that isn't deemed “personal information” under the regulations, such as:
 - Pay & Benefits information, along with your expectation of any future pay package
 - Lifestyle/leisure activities

Our lawful reason for using this data is:



- For compliance with a legal obligation, to conduct checks to identify and verify your identity and check your right to work in the UK
- For the purposes of our legitimate interests, in considering your suitability for employment and in taking steps to enter into a contract
- Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business and your application for work

For employees

- In addition to the information we get for job seekers, we will also collect details of your marital/family status, gender, and date of birth/age
- Details of absences and your health/fitness information, including whether you have a disability
- National Insurance number and tax records
- Third-party contact information, specifically your emergency contacts
- Your employment contract information, including details of your salary, benefits, share schemes, pension arrangements
- Your trade union membership, if applicable
- Information about your use of our IT, communication and other systems, and other monitoring information
- We may also collect other information about you that isn't deemed "personal information" under the regulations, such as
 - Meeting notes, correspondence, contemporaneous notes of conversations, appraisal, and other work performance/output records
 - Your grievance and disciplinary record
 - Bank details

Our lawful reason for using this data is:

- For compliance with a legal obligation, to conduct checks to identify and verify your identity and to maintain records to confirm your continued right to work in the UK
- For the purposes of our legitimate interests, in considering your suitability for employment and in taking steps to enter into a contract
- Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business and your application for work
- For the performance of a contract with you, as your employer
- Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business and your employment
- For the purposes of our legitimate interests for operational reasons, including training

- Statistical analysis to help us manage our business and completion of statutory returns
- Ensuring safe working practices, staff administration and assessments

The reasons listed above do not apply to special category personal information, which we will only process with your explicit consent.

For contractors, clients, and suppliers

- Personal details of your staff or representative(s), such as their name, position in your organisation and contact information, including email address and telephone number
- Images of your staff or representative(s)
- We may also collect other information about you that isn't deemed "personal information" under the regulations, such as
 - Your company details
 - Information to enable us to undertake credit or other financial checks on your organisation

Our lawful reason for using this data is:

- For our legitimate interests in providing you with products and/or services and/or in conducting business with you
- To prevent and detect fraud against you or us
- Conducting checks to identify our customers and verify their identity
- Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business
- Preventing unauthorised access and modifications to systems
- Updating customer records
- Marketing our services or promotional communications*
- Credit reference checks via external credit reference agencies

*We may use your personal information to send you updates (by e-mail, text message, telephone, or post) about our products and/or services. We have a legitimate interest in processing your personal information for marketing or promotional purposes, so we usually do not need your consent. However, where consent is needed, we will ask for consent separately and clearly.

You have the right to opt out of receiving marketing or promotional communications from us at any time.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.



5. How we share personal information

We will share personal information with:

- Third parties we use to help deliver our products and/or services to you, such as payment service providers, warehouses, and delivery companies
- Other third parties we use to help us run our business
- Third parties approved by you, such as social media sites you choose to link your account to or third-party payment providers
- Credit reference agencies
- Our insurers and brokers
- Our bank(s);

We only allow our service providers to handle your personal information if we are satisfied that they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers that we may share your data with to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

6. Where we store personal information

Information may be kept at our offices, third party agencies, service providers, representatives, agents.

Some of these third parties may be based outside the European Economic Area.

7. How long we retain personal information

We will retain your personal information while we are providing products and/or services to you, or during the recruitment process and, if appropriate, your employment. After that, we will keep your personal information for as long as is necessary, to comply with legal requirements, to respond to any questions, complaints or claims made by you or on your behalf; to show that we treated you fairly, and to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Notice.

8. How we keep personal information secure

We have appropriate security measures to prevent personal information from being lost or used or accessed unlawfully. Only those who have a genuine business need to access personal information can see it. Those processing your

information will do so only in an authorised manner and are subject to a duty of confidentiality.

We use appropriate technical security measures including strict encryption, anonymisation and archiving techniques to safeguard your information across all our computer systems, networks, websites, mobile apps, and offices.

We will never ask you for your passwords, nor will we enter your account number or password into an email or after following a link from an email.

All electronic material is backed-up on a daily basis and hard-copy records are stored in a locked, secure cabinet.

We also have procedures to deal with a suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

9. Transfer of personal information out of the UK

We will not share your personal information outside the UK.

10. Your rights under data protection law

You have the following rights under data protection law:

- The right to be provided with a copy of your personal information (the right of access)
If you make a Data Subject Access Request under your access rights, you should note that we may ask you for more information to verify your identity and provide greater details about your request before we comply. If we are legally permitted to do so we may decline your request, in which case we will explain to you why
- The right to require us to correct any mistakes in your personal information
You can ask us to rectify any accurate information we hold. Where appropriate we will tell you which third-parties we have disclosed the inaccurate or incomplete personal data to, so you can take action to inform them of any rectification if you require
- The right to require us to delete your personal information in certain circumstances
Where we agree with the request we will delete your data securely but will generally assume that you would prefer us to keep a note of your name and date of birth on our register of individuals that prefer not to be contacted (this is aimed at minimising the any chance of us continuing to collect data about you). If you disagree with us holding your name and date of birth for this purpose you are free to write to us, as noted below, to tell us



- The right to require us to restrict processing of your personal information in certain circumstances
Your rights apply in the event you dispute the accuracy of the personal data or you object to our processing of your personal data on the grounds of our legitimate interests or if you consider our processing of your data unlawful
- The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third-party in certain circumstances
This right only applies in the event that your personal data has been provided to us by you, and it has been processed automatically, and it has been processed by us based on your consent or in order to fulfil the requirements of a contract
- The right to object at any time to your personal information being processed for direct marketing (including profiling); and in certain other situations to our continued processing of your personal information
Generally, we will only disagree with you if certain limited conditions apply, being that we can show compelling grounds for processing that overrides your interests, or we are processing your data for the establishment, exercise, or in defence of a legal claim
- The right not to be subject to automated individual decision-making
While we categorise our records to fit with how we manage our business, and we may assess groups of individuals based on those categories, none of these activities involve automated decision-making tools – there is always human interaction and/or intervention in the process.

If you would like to exercise any of your rights, please contact us at the address below.

11. How to contact us

If you have any questions or concerns about use of personal information, please contact Equipmake on Tel: 01953 661200, Email: enquires@equipmake.co.uk or by mail to Equipmake Ltd, Unit 7, Snetterton Business Park, Snetterton, Norfolk, NR16 2JU.

12. How to make a complaint

We hope that we will be able to resolve any questions or concerns you may have about use of your information. You can also raise any concerns with the UK Information Commissioner on 0303 123 1113 or visit their website: <https://ico.org.uk/concerns>