



South Staffordshire Plc

South Staffordshire Plc Privacy Notice

1. Introduction

Welcome to the South Staffordshire Plc privacy notice.

South Staffordshire Plc respects your privacy and is committed to protecting your Personal Data. This privacy notice will inform you about how we look after your Personal Data and tell you about your privacy rights and how the law protects you.

This privacy notice is not applicable to current employees of South Staffordshire Plc. In respect of our employees, a separate privacy notice is available internally on the corporate intranet.

This privacy notice does not apply to other group companies within the South Staffordshire Plc group. Please refer to the individual websites of these group companies for their own individual privacy notices.

Please use the Glossary to understand the meaning of some of the terms use in this privacy notice.

2. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information about how South Staffordshire Plc collects and processes Personal Data, including, but not limited to, any data that may be provided through this website when people contact us.

Data Controller

South Staffordshire Plc (collectively referred to as "the Company", "we", "us" or "our" in this privacy notice) is the Data Controller.

We have appointed a Data Privacy Officer who is responsible for overseeing both privacy within the Company and questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Officer using the details set out below.

This privacy notice does not cover the processing of Personal Data that we process on behalf of other group companies. Please refer to the individual websites of those group companies for their own individual privacy notices.

Contact details

Our full details are:

Full name of legal entity: South Staffordshire Plc

Email address: dataprivacyofficer@south-staffordshire.com

Postal address: Group Legal, South Staffordshire Plc, Green Lane, Walsall, WS2 7PD

You have the right to make a complaint relating to the privacy of Personal Data at any time to the Information Commissioner's Office (ICO), (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version of the Notice was last updated on 24th May 2018.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-party links

This website may include links to third-party and other group company websites, plug-ins and applications. Clicking on those links or enabling those connections may allow other parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. The data we collect about you

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data and Contact Data** includes, but not limited to, name, title, email address, residential address, and telephone numbers.

- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

4. How is your Personal Data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, social media, SMS (text), email or otherwise. This includes Personal Data you provide when:
 - we fulfil our contractual or legal obligations
 - you give us some feedback or request information
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers, such as Google, whether based in or outside the EU;
 - (b) search information providers such as publicly available databases based inside or outside the EU such as:
 - Identity and Contact Data from publicly available sources including, but not limited to, Companies House and the Electoral Register based inside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as suppliers based inside OR outside the EU.

5. How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you or an organisation you represent;
- 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; and
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal information.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we could use Personal Data, and, for each way, which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Activity	Lawful basis for processing including basis of legitimate interest
Administration of death in service benefits	(a) Necessary for the performance of a contract We are required to hold Personal Data about individuals in order to enable the payment of death benefits in the unfortunate event of the death in service of an employee.
Claims	(a) Legal Requirement (b) Necessary for our Legitimate interests We are required to hold Personal Data about individuals who wish to make or have made a claim against the Company

	that may or may not be insured. We hold this Personal Data for the purposes of investigating the incident leading to the claim and the subsequent processing of that claim. This Personal Data may be shared with our insurers.
General enquiries	(a) Necessary for our Legitimate interests In the instances of general enquiries to the Company we may be required to hold Personal Data of the individual making the enquiry (and others referred to in the enquiry) in order to properly respond. We generally respond to enquiries using the same method as the individual who contacted us.
Recruitment	(a) Necessary for our Legitimate interests The receipt of CVs from individuals or from third parties, such as recruitment agencies, is part of our standard recruitment process. We use these CVs to shortlist candidates for interview and to complete the recruitment process. The Company does not operate any automated shortlisting processes.
Visitor registration	(a) Necessary for our Legitimate interests For security reasons and to provide a duty of care we are required to record certain Personal Data in respect of all visitors to our offices.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation For running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your Personal Data for the purposes for which we collected it.

We may need to use your Personal Data for another reason and we will only do this if that reason is compatible with the original purpose for which we collected your Personal Data.

If you would like an explanation about how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

6. Disclosures of your Personal Data

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties:

Activity	Third Parties
Administration of death in service benefits	HR departments (managed by another group company on behalf of the Company) and Trustees of the death in service Trust in order to enable the payment of death benefits.

Claims	Depending on the nature of the claim there is the need to liaise with and transfer Personal Data to other South Staffordshire Plc group companies for the purposes of investigating the claim.
General enquiries	Depending on the enquiry and in order to properly respond to it we may transfer the contact to another group company and in doing so this may involve the transfer of Personal Data.
Recruitment	HR departments (managed by another group company on behalf of the Company) for the purposes of supporting the recruitment process.
Visitor registration	Another group company manages the office reception on behalf of the Company and therefore there is a need for Personal Data to be received by that related company.

External Third Parties:

Activity	Third Parties
Administration of death in service benefits	Insurers and insurance brokers and other advisors such as legal advisors in order to enable the payment of death benefits and this may involve the transfer of Personal Data to them.
Claims	Insurers, legal advisors and loss adjusters may be used for the purposes of managing claims and this may involve the transfer of Personal Data to them.
General enquiries	In some cases advisors such as legal advisors may be used to properly respond to an enquiry and this may involve the transfer of Personal Data to them.
Recruitment	If we receive a CV from a recruitment agency then we may be requested to provide feedback to the candidate via the recruitment agency.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets to. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and the law.

7. International transfers

We do not transfer your Personal Data outside the European Economic Area (EEA).

8. Data security

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

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research, system testing or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no legitimate reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data from our records where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with applicable laws. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (c) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please contact the Data Privacy Officer at dataprivacyofficer@south-staffordshire.com.

11. Glossary

Data Controller: means the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Data Controller of all Personal Data relating to our employees and Personal Data used in our business for our own commercial purposes.

Personal Data: means any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Data Subject: means a living, identified or identifiable individual about whom we hold Personal Data.

Pseudonymisation or Pseudonymised: means replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

Sensitive Personal Data/Special Categories of Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

LAWFUL BASIS

Legitimate Interest: means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law or regulation). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract: means processing your data where it is necessary for the performance of a contract to which you are a party, or which you are arranging for someone else or for another organisation, or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation: means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.