

Supply Chain Privacy Notice



Partnering in Property Management Limited (PPM Limited) is committed to complying with its legal obligations under the General Data Protection Regulation (“GDPR”) and to the protection of the rights and freedoms of individuals whose personal data PPM Limited obtains or generates as part of its business operations.

This policy describes how and why we collect, store and use personal data relating to the employees and workers of our supply chain partners working on our behalf or on our sites. It also provides information about individuals’ rights. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We have separate privacy policy in relation to the way that we use information about our employees.

We are a Data Controller which means we are responsible for deciding how we hold and use personal information about you and to make you aware of how and why your personal data will be used for the purpose of the recruitment exercise, and how long it will usually be retained for.

In this policy “we”, “us” and “our” refers to PPM Limited.

What personal data do we hold?

We will collect, store and use the following categories of personal information about you:

- Personal details, including name, title, address, telephone numbers, email address, date of birth, gender, employment history, qualifications;
- Training history and details of any site inductions;
- Professional / Occupational Qualifications;
- Next of kin details and emergency contact information;
- Information about your right to work in the UK.

We may also collect, store and use the following “special categories” of more sensitive personal information to ensure your needs are met and to support the safeguarding of our customers, employees and contractors:

- Information about your health, including any medical conditions;
- Drug and alcohol results data, if appropriate; and
- Information about criminal convictions and offences (if relevant to the contract you are working on or the nature of the services delivered to us)

How information is collected

We collect personal information about our supply chain from the following sources:

- You
- Your employer;
- The Disclosure and Barring Service or Disclosure Scotland, if appropriate; and
- Third party drug and alcohol testing services, if appropriate.

How we use information about our customers

We may use the information that we have for you to:

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- To ensure that you have the right skills, training and qualifications to comply with relevant regulatory requirements and standards of works;
- Health and safety monitoring of performance;
- To ensure your needs are met and to support the safeguarding of our customers, employees and contractors
- Safeguarding purposes and to achieve the aims of our Modern Slavery Policy;
- To verify that you have the legal right to work on our sites or provide services on our behalf.

We are allowed to process this information about you because it is in our legitimate interests and our legal obligation to protect the health, safety and vital interests of you and others and duty of care to the Health and Safety at Work Act. We also need to process your personal information to ensure the efficient operation of our sites and services.

If you do not provide information

If you do not provide information when requested, it may be necessary for us to exclude you from site and inform your employer.

Data Sharing

We will only share your personal information with the following third parties for the purposes of processing your application:

- Where required because of a legal obligation (i.e. the Health and Safety Executive)
- Your employer
- A third party service provider (e.g. software hosting providers)
- Associated companies

All our third party service providers and Associated Companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow 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.

Security

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 value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. Please remember that no method of transmission over the internet (for example by email or webmail), or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Your rights as a data subject

Under certain circumstances, you have certain rights which you may exercise if we are in possession of, or are processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that we hold about you.

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- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.

To exercise these rights please contact us using the contact details set out in the Contact Information section below. In the event that PPM Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the Complaints section below.

Right to withdraw consent

If you have provided us with consent to us processing your personal information you have the right to withdraw your consent for processing for that purpose at any time. To exercise these rights please contact us using the contact details set out in the Contact Information section below.

On what basis do we process personal data?

We will only process personal data where we have a lawful basis on which to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by us but will be one or more of following:

- **Consent:** you have provided your consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with our legal obligations, in the safeguarding against and the prevention of threats to public security, as specified in the Law Enforcement Directive.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party.

For how long do we hold personal data?

We will retain personal information for the period necessary to fulfil the purposes for which it is collected and processed, or for such shorter or longer period as may be prescribed by applicable law, the requirements of health and safety legislation or PPM Limited's internal policies and procedures.

Further information on our retention policy can be requested by contacting us via the information provided in the Contact Information section below.

Disclosure of your information

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We may also disclose your personal information to third parties in certain circumstances including:

- We may provide personal data to clients, third party suppliers, service providers, professional advisors and other business partners to enable us to provide or receive products or services.
- In connection with the administration and operation of our business we may provide personal data to third parties who provide support services including IT, finance and accounting, business development and consultancy services.
- In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- We may disclose or share your personal data if we are under a duty to do so in order to comply with any legal obligation or where necessary to enforce any legal right or contractual agreement, or to protect the rights, property, or safety of Partnering in Property Management, our employees, customers, or others. This includes exchanging information with other companies, organisations and bodies for the purposes of fraud protection and credit risk reduction.

We want to inform our Service users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Changes to our Privacy Notice

This Privacy Notice was last updated in May 2018. Any changes we may make to our Privacy Notice in the future will be posted on this page and we suggest that you check back frequently to see any updates or changes.

Contact information

Our Data Protection Officer, Beth Nicholls, is responsible for the management of personal data within PPM Limited and for ensuring that compliance with data protection legislation and good practice can be demonstrated. Questions, comments and requests regarding this Privacy Notice or our collection or use of personal data should be addressed to:

The Data Protection Officer

PPM Limited

Atlantic House

Fletcher Way

Carlisle

Cumbria

CA3 0LJ

Email: communications@ppm-limited.co.uk

Complaints

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If you wish to make a complaint about how your personal data is being processed by us (or the third parties referred to in this Privacy Notice), or how your complaint has been handled, you have a right to lodge a complaint with our Data Protection Officer using the contact details above or by contacting:

The Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Email: casework@ico.org.uk