



FERN
Plastic Products Ltd.

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Registered number 624855 England
VAT: GB 100 0540 57

PRIVACY POLICY

SUMMARY

We are committed to maintaining the trust and confidence of our employees, customers, suppliers, visitors to our premises or website and anyone else whose personal data we may process. In particular, we want you to know:

Fern Plastic Products Ltd does not buy, sell, lease or trade personal information for any purpose.

Our privacy policy details how we comply with legislation such as GDPR; why we collect your personal data, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

Basis for processing personal data

We only process personal data where we have a lawful reason for doing so, because we have your consent, contractual obligations with you or your organisation, legal compliance or other legitimate business interests which do not materially impact your rights, freedoms or interests.

Data retention and security

We only process the personal data we need for the period we need it after which it is deleted. We endeavour to keep it up to date and we have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed in an unauthorised or unlawful way.

Your Rights

You have legal rights governing the use of your personal data. You have the right to understand what personal data is held, for what purpose, how it is collected, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. You can also request deletion of your personal data.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

Data Controller / Contact Details

Fern Plastic Products Ltd is the controller and responsible for your personal data. We have appointed a data privacy manager who is responsible for overseeing the implementation of our privacy policy. If you have any concerns or questions, including any requests to exercise your legal rights, please contact us below:

Data Privacy Manager
Fern Plastic Products Ltd
Macrome Road, Wolverhampton, WV6 9HD
01902 758282
contact@fern-plastics.co.uk

Iain R. Graham
Managing Director

1. INTRODUCTION

Fern Plastic Products Ltd is the controller and responsible for your personal data (collectively referred to as Fern Plastic Products Ltd, “we”, “us” or “our” in this privacy policy).

“You” are the data subject about whom we process personal data otherwise referred to as “your personal data” in this privacy policy.

“Third parties” are any other organisations or individuals otherwise referred to as “they” or “them”.

PURPOSE

This privacy policy details how we comply with legislation such as GDPR; why we collect your personal data, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

LAWFUL BASIS FOR PROCESSING DATA

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent. For example, when you positively opt in by signing to agree or ticking a box to receive communications in relation to a specific service. When requesting consent to keep or record your personal data, we’ll make clear to you which data is necessary in connection with a particular service. You can opt out by contacting us and requesting us to cease your contact at any time.

Contractual Obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you are a sole trader, to pay for services rendered we may need your personal bank details.

Legal Compliance

If the law requires us to, we may have to collect and process your data. For example, if you are an employee, we need to retain certain information on your wages and hours worked in order to show we comply with national living wage legislation.

Legitimate Interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

2. THE DATA WE COLLECT & HOW WE USE IT

Personal data is any information about an individual from which that person can be identified. It does not include data where your identity has been removed or cannot be identified (anonymous data).

We have categorised the types of 'Data Subjects' we collect personal data from. This will make it easier for you to identify what category(s) you may fall under and the types of personal data that may process about you.

Data Subjects	Data Processed	Lawful Purpose
Employees/Agency Workers/Job Applicants/Volunteers	Name Date of Birth Home Address Phone Numbers Email Addresses Photograph Birth Certificate/Passport Medical History/Conditions Next of Kin/Emergency Contact Motor Vehicle Details National Insurance Number Tax Reference Bank Details Earnings/Deductions/Pensions/Benefits Employment History Hobbies & Interests Education & Qualifications Training Records Discipline/Grievance/Capability Records Holidays and Other Absence Court Orders	Health and Safety Contract of Service/Employment Security Insurance HMRC DWP HM Home Office HM Courts & Tribunals
Customers/Prospects (Organisations only – qualified by buying authority, financial capacity and willingness to buy)	Name Organisation and Address Position Phone Numbers Email Addresses	Sales/Purchase Contracts Customer Service Credit Control Insurance
Suppliers/Vendors (of goods or services: organisations, contractors/sub-contractors, self-employed, sole traders etc)	Name Organisation and Address Position Phone Numbers Email Addresses Bank Details Tax Reference Credit Rating Reports	Sales/Purchase Contracts Expediting Payment Insurance
Visitors (to Fern premises)	Name Organisation Position Phone Numbers Email Addresses Motor Vehicle Details Photograph	Health & Safety Insurance
Website Visitors (www.fern-plastics.co.uk)	IP Address (Anonymous)	Security

Other Correspondents (government agencies, charities, potential suppliers, service providers etc)	Name Organisation Position Phone Numbers Email Addresses	Compliance Contract Negotiation
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Guest WiFi/Internet Connection

When you visit Fern Plastic Products Ltd you may use our guest wifi if you request access. The connection is not monitored and use of the wifi is entirely at your own risk.

Web Analytics

We subscribe to various web analytics services such as Google and Bing. When you visit our website at www.fern-plastics.co.uk these services collect standard internet log information and details of visitor behaviour patterns. We analyse this data to find out things such as the number of visitors to the various parts of the site or the times of day when visitors are browsing and this enables us to make decisions on how best to improve website functionality/efficiency and ultimately, the experience of the visitor. This information is only processed in a way which does not identify anyone; aggregate statistical information is used in any decision making. We do not make, any attempt to find out the identities of those visiting our website(s) although the IP addresses used by web-site visitors may be recorded. Google, Bing and other web-browsers use “cookies” to collect visitor behaviour patterns and you can find out more about them here:

https://en.wikipedia.org/wiki/HTTP_cookie
www.allaboutcookies.org

Website Contact Link

Our website contains a “Email Us” link which will directly open up your chosen email program and add our contact email address. Any personal data you email us is not stored in our website database, the data submitted is only recorded in our secure email exchange server and we use it to enable us to respond to genuine enquiries made via our website.

4. DATA RETENTION

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, accounting or 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.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

If you would like more information about the retention periods for specific data types, please contact our data controller.

5. DISCLOSURE OF YOUR PERSONAL DATA

When we have to share your personal data with third parties we make sure that:

- We obtain your consent (unless it is not required and we are compelled to share it)
- We provide only the information they need for their specific purposes
- They only use your data for their specific purposes, this can be in a formal agreement
- We work closely with them to ensure that your privacy is respected and protected at all times
- When they no longer need it, any of your personal data held by them will be either deleted or rendered anonymous

Below is a (non-exhaustive) list of third parties we are likely to share your data with:

- HMRC
- DWP
- Other UK government departments such as home office, courts and tribunals etc
- Pension providers
- IT and support providers
- Delivery contractors/sub-contractors
- Providers of verification of identity, credit-worthiness etc
- Professional services providers such as lawyers, bankers, auditors and insurers
- Employment agencies
- Others such as landlords or reference requests

Many of the above have their own privacy policies and we will require them to provide copies for our records. Information on all active third parties can requested if required.

6. SECURITY OF DATA

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 regardless of how and where it is stored. In addition, we limit access to your personal data to those of our employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have also 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.

Your personal data may be stored as hard copy paper-work in locked files or digitally on computers and other devices which are password-protected and firewalled. If you would like more information about the security measures for specific data types, please contact our data controller.

7. YOUR RIGHTS

You have legal rights governing the use of your personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. You can also request the deletion of your personal data.

Your rights are as follows:

- The right to be informed about the personal data being processed
- The right of access to your personal data
- The right to object to the processing of your personal data
- The right to restrict the processing of your personal data
- The right to rectification of your personal data
- The right to erasure of your personal data
- The right to data portability (to receive an electronic copy of your personal data)
- Rights relating to automated decision making including profiling

You can exercise your rights at any time. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

In exercising your rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedent over any request you make. Where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

If you would like to make an enquiry regarding personal data, please email our data controller directly with your request, making sure to include:

- Full name
- Relation to the company (see Data Subjects)
- Your request

Under the GDPR we are under obligation to respond to a Data Subject Access Request (DSAR) within one month, we will do our best to respond to most requests within 1 week, however there may be cases where a more thorough request may be required, needing more time to gather all the information and personal data.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

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