

PRIVACY POLICY **(Issue 1, 25th May 2018)**

INTRODUCTION

James Douglas Limited ("JDL") have introduced a Privacy Policy to reflect recent changes to data protection laws that became effective on 25th May 2018.

We are under a legal obligation to let you know what personal data we collect about you, what we use it for and on what basis. We always need a good reason, and we must explain your rights in relation to the information we hold about you.

We want you to be confident that we will always keep your data securely and to use it lawfully and ethically, respecting your privacy always.

Generally, we rely on three of the six general conditions under GDPR for lawfully processing data.

1. We want to collect and use your information for our business purposes. We will ask for your consent and, if we do, that permission will always be indicated by a positive action from you. You are also free to withdraw your permission at any time.
2. We may come to the view that data processing falls within our "legitimate interests" to use the information in a particular way without your permission. However, when we do this, we will tell you because you may have a right to object, and if you object specifically to us sending you marketing material we will then stop.
3. If you have ordered a product or service from us, we are entitled to process your information so that we can provide that product or service to you and meet our contractual obligations to you.

This Privacy Policy is here to help you to understand what information we collect, why we collect it, as well as your data protection and privacy rights. We hope that the following sections will answer any questions you have but if not, please do get in touch with us. Our contact details are provided at the end of this policy document.

INFORMATION COLLECTED

This Privacy Policy covers information practices, including how the Company collects, uses, shares and secures any personal information you provide.

When expressing an interest in obtaining information about our products and services, JDL will require you to provide us with personal contact information (such as name, Company name, address, phone number and e-mail address).

When individuals apply for a job with JDL we will require you to submit additional personal information as well as a resume or CV.

Required Contact Information, Invoicing Information, Applicant Information, Optional Information and any other information you submit to JDL are referred to collectively as “data”.

As you navigate the JDL website, we may collect data through commonly used information gaining tools. This includes information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on our website (such as web pages viewed and links clicked).

USE OF INFORMATION COLLECTED

We use data about JDL customers and website visitors to perform service requests. For example, if you fill out a “contact JDL” web form, we will use the information provided to contact you about your request.

JDL may also use data about customers and visitors for marketing purposes. For example, JDL might contact you to discuss your interest in specific products and services and send you information regarding the company and new products and services.

JDL uses commonly used information gathering tools to collect information as you navigate the site. We use this information to analyse trends, administer the website, track users’ movements around our website and gather information about our user base and aggregate non-personal information.

SHARING OF INFORMATION

JDL does not share any of your personal data with other companies or service providers. We use your personal information only as necessary, to provide requested services to you and us. JDL does not share, sell, rent or trade any information with third parties for their promotional purposes.

We have mapped out all the ways data can leave our system. We do use a third-party service providers for storing data and we have confirmed that all of these service providers are GDPR compliant.

COMMUNICATION PREFERENCES

Every marketing email from JDL will contain instructions about how to opt out of receiving future marketing e-mails from us. You can update e-mail preferences or unsubscribe at any time by contacting info@jamesdouglas.net.

CORRECTING AND UPDATING YOUR INFORMATION

JDL may retain your information for a period consistent with the original purpose of collection. We may retain your information to pursue our legitimate business interests, comply with our legal obligations, conduct audits, resolve disputes and enforce our agreements.

You may exercise the following rights in relation to your personal data:

- The right to be informed. This Privacy Notice gives you transparency on how JDL processes and handles your personal data. If you have any questions, please do not hesitate to contact us on info@jamesdouglas.net.
- The right to access. You are allowed anytime and free of charge to access your personal data so that you can verify the lawfulness of the processing. Information will be provided without delay and at the latest within one month of receipt.
- The right to rectification. You are entitled to have personal data rectified if it is inaccurate or incomplete.
- The right to erasure or to be forgotten. You can request deletion or removal of your personal data where there is no compelling reason to its continued processing.
- The right to restrict processing. You have the right to suppress processing of personal data.
- The right to portability. This allows you to obtain and re-use your personal data for your own purposes across different services.
- The right to object. You have the right to object to a) processing based on legitimate interests or performance of a task in the public interests/exercise of official authority, b) direct marketing and c) processing for purposes of scientific/historical research and statistics.
- Rights in relation to automated decision making and profiling.

SUBJECT ACCESS REQUESTS

If an individual, whose personal data is held by the Company, requests information as below, this is called a Subject Access Request. The individual can:

- Ask for information the Company holds on them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the Company is meeting its data protection obligations.

Subject Access Requests from individuals should be made to the JDL data controller by e-mailing them at info@jamesdouglas.net.

There shall be no charge for providing a copy of information requested, however the company may charge an administrative cost if further copies of the same information are requested. Information requested shall be provided within a reasonable time and at least one month after the request.

DATA SECURITY

JDL is committed to keeping your personal data safe and secure and we have established internal procedures to ensure that no one at JDL does anything to jeopardise your data privacy. Our security measures include:

- Internal procedures setting out our data security approach including risk assessments and regular reviews
- Relevant staff are trained about our GDPR procedure and policies and all staff are aware of our Privacy Policy.
- Security controls which protect the entire IT infrastructure from external attack and unauthorised access.
- Ensuring adequate controls exist to protect the IT infrastructure of service providers who store data and that they are GDPR compliant.

CONTACTING US

JDL's Data Controller is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. You can exercise your rights at any time and get further information regarding this and our general privacy policy by contacting us at info@jamesdouglas.net

CONTACTING THE REGULATOR

If you feel that your data has not been handled correctly by JDL, or you are unhappy with our response to any requests you have made to us regarding the use of data, you have a right to lodge a complaint with the Information Commissioner's Office by calling them on 0303 123 1113.

Mike Hawkes
Managing Director