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### **Privacy Policy – Non-employees**

This policy explains how Jointline Limited will use your personal information when you become a client, supply us with goods/services or visit our sites and offices. It also describes how long that information is kept and the circumstances in which we might disclose it to a third party. The information that we hold is used solely to enable us to run our business and manage our client/supplier relationship with you.

#### **Information we hold**

The information we hold includes:

- Company name and contact details for the company including employee names, telephone numbers, company postal address and e-mail addresses.
- Where we pay you, we will also hold your bank account details, VAT registration number, UTR number, CIS number and other data that we need in order to trade effectively.
- Historic e-mails or hard copy documents between us including purchase orders, general correspondence and quotations.
- Insurance details where you are a sub-contractor.
- Your responses from any assessment questionnaire which we use in order to assess your suitability for inclusion onto our approved supplier list.
- Records of audits that we conduct on your company employees whilst working on our behalf as a sub-contractor on a client site.
- Photographs, identification, qualifications or drug and alcohol test results used for building or on-site access passes.
- Systems and building access history including CCTV at depots and signing in sheets where you attend our offices.
- Records of the hours of work that you undertake for us.

#### **How we use information**

Jointline and any companies that process data on our behalf, will use your information purely for the purposes of managing Jointline's relationship with you. The information provided will be used to:

- Pay you
- Assess your suitability to supply us with goods/services



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- Allow us to provide you with an effective service in line with your requirements
- Manage any disputes that may arise between us
- Keep you informed about any changes within Jointline that you may need to be aware of
- Keep you updated with our latest offers and services where you have indicated that you wish to receive this

Your information will only be accessed and processed by authorised personnel (i.e. contract managers, accounts staff and occupational health professionals) who are directly involved in the management and administration of your relationship with Jointline and have a legitimate need to access your information.

### **Length of time we keep information**

We will only keep information for as long as we need to or are legally required to do so. Our full retention schedule is available on request and this explains how long each item of information will be retained.

Please note that information included in relation to occupational health and tax will normally need to be retained for much longer periods.

### **Protection of your information**

We take the privacy of your data very seriously and have a range of robust policies, processes and technical measures in place to safeguard your information.

Access to systems that hold personal information, bank account details or tax related information is restricted to authorised personnel through the use of unique identifiers and passwords. Your information is stored on systems that are protected by secure network architectures and are backed-up on a regular basis (to a second secure location) for disaster recovery and business continuity purposes and to avoid the risk of inadvertent erasure or destruction.

### **Sharing personal information**

Jointline Limited collects and uses personal information. The lawful bases we use for this activity in Europe, as required under European data protection laws, are:

- Where it is necessary for entering into or performing a contract with you
- Where we have a legitimate interest to do so, provided your rights do not override these interests
- Where you have consented to its use
- Where our colleagues believe it is in your vital interests to share your personal details, for example with emergency services



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- Where required to comply with our legal obligations

### **Product enquiries, sales and administration**

As part of a purchase, product enquiry, request for information and for account administration, we collect information such as your name, country, job title, company information or academic affiliation, postal address, e-mail address and telephone number.

If you have made an enquiry about us or our products or services, either online or over the phone, we will use your personal information to respond to the enquiry or to take other steps at your request, before you enter into a contract. For example, we collect the e-mail addresses and additional contact details of those who send e-mails to request information.

If you have registered for or purchased a product or service, including on a trial basis, your personal information will be used to provide that product or service, communicate about it and handle payments, as is necessary for the performance of the contract entered into with us.

For purchases, payment information, including credit/debit card number/bank details and billing addresses are also collected.

If your personal information is relevant to certain products and is freely available through public sources, such as on a website related to your work or profession, we may use this personal information for providing customers with our products, as is necessary for the purposes of our legitimate interests as a commercial organisation.

Our employee data is physically stored in UK data centres.

### **Marketing**

We will use your personal information to send you newsletters, offers or other marketing emails that keep you up to date with our news, events and products that may be of interest. Depending on the nature of your interaction with us and the laws of the country where you live, you may have actively given us your consent for this, by opting in, or we may be entitled to rely on your implied consent or our legitimate interests. The opportunity to opt out of future marketing emails will always be provided, and information on how to do this given when your personal information is collected and on every marketing email sent. Further information on how to change your marketing preferences is provided in the section below.

### **How to access information and change your marketing preferences**

Please make all access requests to Jointline Limited on: [jointline@jointline-group.co.uk](mailto:jointline@jointline-group.co.uk).

### **Your rights**

Under the General Data Protection Regulation (UK-GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. These include:

- The right to request access to data we hold on you



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- The right to rectification or erasure of your personal data in certain circumstances
- The right to restrict processing or withdraw your consent for processing at any time
- The right to data portability
- The right to lodge a complaint to the Information Commissioner's Office if you believe that we have not complied with the requirements of the UK-GDPR or DPA 18 with regard to your personal data.

### **Identity and contract details of data processor**

The person with overall responsibility for data processing within Jointline is Pete Charters. Pete can be contacted at:

Jointline Limited  
Airfield View  
Camp Road  
Witham St Hughs  
Lincoln  
LN6 9TW

Telephone: 01522 868636

### **Policy Review**

This policy will be reviewed on an annual basis, or sooner if required.

|                       |                                    |
|-----------------------|------------------------------------|
| <b>Authorised by:</b> | <b>Pete Charters</b>               |
| <b>Position:</b>      | <b>QSHE &amp; Finance Director</b> |
| <b>Date:</b>          | <b>5<sup>th</sup> March 2021</b>   |
| <b>Issue:</b>         | <b>6</b>                           |