

## **PRIVACY POLICY**

It is vitally important to us that your personal information is kept safe and confidential. It is equally important that when you communicate information to E+M Tecnica or we communicate with you that it is secure.

This policy is intended to make sure that we, E+M Tecnica do all that we can to ensure that information and communication with you is kept private and safe.

### **What kind of information do we gather about you and who do we share it with?**

#### **Upon visiting our website:**

Our website's transmission of information is encrypted and protected using Secure Sockets Layer (SSL).

Our site does *not* ask for any personal data, transmit or store anything on our, or any third-party server.

We use Google Analytics which uses cookies but does not store any personal data. It transmits an IP address which is anonymised at the earliest opportunity, so data cannot be traced to an individual.

#### **Engaging in business activity:**

If we are engaged on a project with you as client or as another member of the design team or a contractor or indeed in any other kind of commercial transaction or business activity, then the we will need to hold and process data about you.

Throughout our business engagement activities and for as long as is necessary after the completion of a project and/or duration of any transactions, then we will continue to need to process data about you.

The kind of data that the Company will hold and process includes:

- Name
- Job Title
- Company Address
- Email Address
- Mobile
- Telephone Number

The Company believes that those records used are consistent with the business relationship between us and yourself, and with the data protection principles. The data we hold will be for administrative use only.

We may also receive information about you through third parties with whom we engage, such as business partners.

We will never sell or share your personal information with any third party for marketing purposes.

We also do not ask that you provide any sensitive personal data.

### **Using your information in accordance with data protection laws**

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on two conditions, depending on the activities we are carrying out.

**Contract:** We rely on this lawful basis to process personal data either to fulfil our contractual obligations to you as our client and/or project team members to provide you with a quote or when you instruct us to advise you on a new engagement forming an Engagement Contract between us.

The processing of data is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.

**Legitimate interests:** To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to communicate and provide our services to you.

If you provide information to us we will be better able to provide information and services.

### **How long do we keep your information for? (Retention Periods)**

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it for in the first place.

In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards if you stop doing so in case you decide to return to us. After that we will delete it other than where we lawfully can keep any data for audit or legal reasons. We shall keep personal data in relation to our projects on our secure database for a period of up to 12 years.

### **Social media**

Any social media posts or comments you send to us (on the E+M Tecnica LinkedIn page, for instance) will be shared under the terms of the relevant social media platform (e.g. LinkedIn / Twitter/ Instagram) on which they are written and could be made public.

Other people, not us, control these platforms. We are not responsible for this kind of sharing. We recommend you should review the terms and conditions and privacy policies of the social media platforms you use to better understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unhappy about it.

Any review or other posts or comments you make about E+M Tecnica's services on any of our user community services will be shared with all other members of that service and the public at large. Any comments you make on these services and on social media in general must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

### **Security Technology, Systems and Hardware**

E+M Tecnica has made a substantial investment in server, database, backup and firewall technologies to protect our information assets.

We are currently working towards Cyber Essentials Accreditation to ensure we follow industry standard best practices and are in the transition process of moving to a new internal job costing and CRM software which will aid us to be further compliant with GDPR.

These new software systems will enable us to more easily fulfil our obligations for "subject access request" and 'the right to be forgotten' (Article 17, GDPR 2016). Personal digital data can be securely destroyed on receipt of a written request from authorised users.

Our database resides in a controlled, secure data server. This means that information about the identity and preferences of individual members is strongly protected by us against unauthorised access. We will maintain safeguards to protect the security of these servers and your personal information.

Data backups are provided as part of the Microsoft Azure platform that the data resides on and are carried out continuously over a rolling 30-day period. This allows for data to be retrieved from a single date and hour within 30 days.

Server access for E+M Tecnica staff is restricted and monitored.

All E+M Tecnica laptops and desktops run the latest security patches and antivirus software.

We use a 3rd party IT Support Partner who are fully compliant with GDPR.

### **Disclosure**

E+M Tecnica will not use or disclose your personal information without your consent, except:

- where required or authorised by law;
- to implement the terms of any agreement we have with you;
- to assist the lawful investigation of a law enforcement authority;
- to protect the rights, property or personal safety of another E+M Tecnica customer, any member of the public or E+M Tecnica;
- the assets and operations of the business are transferred to another party as a going concern;
- or
- as otherwise described in this Privacy Policy.
- We may exchange your personal information with our related bodies, your representatives and with our service providers that assist us with archival, auditing, accounting, legal, business consulting, banking, payment, data processing.

**Recruitment**

If you apply for a position with us, we may also collect information about your experience, qualifications and skills (including identity, eligibility to work, reference, background). We collect, use and disclose your personal information to assess your application. We may exchange your personal information with senior management, recruiters, academic institutions, professional and trade associations, referees and your current and previous employers. Without your personal information we may not be able to progress considering you for positions with us. If your application is successful and you become a member of staff we will provide you with a copy of the Staff Privacy Notice. The retention periods referred to therein will apply to your personal data during your employment.

Should your application be unsuccessful we will only hold your name and other submitted details for a further 6 months for the sole purpose of identifying any duplication with other recruiters. We will not process your personal data any further.

**Changes to the policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website.

**Breach of security***Contacting E+M Tecnica*

If you suspect that we have allowed your data to reach an unauthorised person we ask that you provide us with a statement of how you believe this happened and any evidence you have to help us establish any issues. We will investigate and take action as necessary to remedy any breach of security.

Or if you have any questions about our privacy statement, or you wish to access or correct the personal information we hold about you, please contact our Practice Manager:

**Postal Address**

196-197 High Street, Egham, Surrey, TW20 9ED

**Telephone**

01784 431333

**Email**

mail@emtecnica.com

In the case of access and correction requests, please provide as much detail as you can about the particular information you seek, in order to help us locate it. We will comply with any applicable legal requirements to provide reasons if we deny any request for access or correction, or to make a requested note of your desired correction with the information.