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## PRIVACY POLICY

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### BACKGROUND:

Emanuel Spence Maintenance Services Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.esmsl.co.uk](http://www.esmsl.co.uk) ("Our Site") and (subject to the limited exceptions in section 6, below) We do not collect personal data about you unless you contact us (see section 5, below). Any personal data We do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

<b>"personal data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
<b>"We/Us/Our"</b>	means Emanuel Spence Maintenance Services Ltd ( t/a Emanuel Spence and ESMSL ) , a limited company registered in England under company number 06806377, whose registered address is Letitia Industrial Estate, Middlesbrough. TS5 4BE, and whose main trading address is the same..

### 2. Information About Us

- 2.1 Our Site is owned and operated by Emanuel Spence Maintenance Services Ltd , a limited company registered in England under company number 06806377, whose registered address is Letitia Industrial Estate, Middlesbrough. TS5 4BE, and whose main trading address is the same.
- 2.2 Our VAT number is 158094783
- 2.3 Our Data Protection Officer is Mr T Dog, and can be contacted by email at [t.dog@esmsl.co.uk](mailto:t.dog@esmsl.co.uk), by telephone on 01642 247938, or by post at Letitia Industrial Estate, Middlesbrough. TS5 4BE.
- 2.4 We are regulated by the Information Commissioner.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of

any such websites before providing any data to them.

#### 4. **Your Rights**

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
  - 4.1.1 The right to be informed about Our collection and use of personal data;
  - 4.1.2 The right of access to the personal data we hold about you (see section 8);
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 9);
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 9);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 9 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.]

#### 5. **What Data Do We Collect?**

- 5.1 Subject to section 5.2, We do not collect any personal data from you. We do not place cookies on your computer or device, nor do We use any other means of data collection.
- 5.2 If you send Us an email, We may collect your name, your email address, and any other information which you choose to give Us.

#### 6. **How Do We Use Your Data?**

- 6.1 If We do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 As noted above, We do not generally collect any personal data. If you contact Us and We obtain your personal details from your email, We may use them as follows:

- 6.2.1 To reply to your email;
- 6.2.2 To comply with Health and Safety legislation, HMRC regulation and Gas Safety Regulation, and other Government Requirements.
- 6.3 Any and all emails containing your personal data will be deleted no later than 6 Years after your contact with us'
- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.5 We will not share any of your data with any third parties for any purposes.

## 7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored in the UK and Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If We do store data outside the EEA (this may be the case, for example, if Our email server is located in a country outside the EEA), We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address).
- 7.4 Steps We take to secure and protect your data include , data encryption.

## 8. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [t.dog@esmsl.co.uk](mailto:t.dog@esmsl.co.uk) , or using the contact details below in section 9. Alternatively, please refer to Our Data Protection Policy.

## 9. **Consent**

Where we have, or are undertaking a contract with an individual or Company, to supply goods or services they have requested, or to fulfil our obligations under a contract, also including steps taken before entering into a contract. This would be a lawful basis. This would include examples, contacting us for an estimate, quotation or enquiry, contacting us for a job or contract, or requesting information or a service with us, applying for a job or attending an interview.

Consent is not required where the Company has a Legitimate Interest in for example Commercial benefit ( ref EU Regulation 679 Article 6(1)(f). unless this is outweighed by harm to the individuals rights and interests.

## 10. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [t.dog@esmsl.co.uk](mailto:t.dog@esmsl.co.uk) , by telephone on 01642 227938, or by post at Letitia Industrial Estate, Middlesbrough. TS5 4BE. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 8, above).

## 11. **Changes to Our Privacy 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 Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.