



## Privacy Notice V2.0

Our Privacy Policy explains how we use your personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

### 1. Who we are

White Horse Contractors Limited is the data controller of this website.

If you have any questions about how we process personal data, or would like to exercise your data subject rights we can be contacted at:

White Horse Contractors Ltd  
Barrow Farm  
Farringdon Road  
Shippon  
OX13 6UX

[whc@whitehorsecontractors.co.uk](mailto:whc@whitehorsecontractors.co.uk)

Our Data Protection Officer (DPO) is James Welch.

### 2. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
- To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- To fulfil a contract that we have entered into with you or with the entity that you represent;
- To ensure the security and safe operation of our websites and underlying business infrastructure, and
- To manage any communication between you and us.

The table in Section 3 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

### 3. Lawful basis for processing data

The table below describes the various forms of personal data we collect and the lawful basis for processing the data. Our systems and infrastructure are set up so that all personal data is processed on common, group-wide platforms. We have processes in place to make sure that only people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties. Where this happens this is identified in the table.

We also collect information when you voluntarily complete customer surveys or provide feedback. Website usage information is collected using cookies.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:



**The purpose test** – is there a legitimate interest behind the processing?

**Necessity test** – is the processing necessary for that purpose?

**Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

| Information category                             | Data Collection  | Purpose for collection   | Lawful basis for processing                      | Data shared with                     | Retention period  |
|--|--|--|--|--------------------------------------|---|
| <b>Purpose - To provide you with information</b> |  |  |  |                                      |   |
| Subject matter information                       | Name, company name, geographic location, email address, business sector.   | To provide appropriate online or email information about products and services that you have requested   | <b>Contractual fulfillment</b>                   | Internally only                      | Maximum 6 years from the date the information is collected.<br><br>6 months if a marketing email is left unopened       |
|  | Telephone No   | To provide further, related, online or email information and ongoing news updates in relation to the identified area of interest.<br>Follow-up to ensure requested information meets needs and identify further requirements | <b>Legitimate interest</b>                       | Internally only                      |   |
|  | Personal contact information as provided through website forms or at trade shows or any other means.   | General mailing list subscription  | <b>Legitimate interest</b><br><br><b>Consent</b> | Internally only                      |   |
| <b>Purpose - Transactional information</b>       |  |  |  |                                      |   |
| Transaction details                              | Name, physical address, Invoice address email address, telephone no bank account details (for credit accounts), other medium of content delivery | To process purchase transactions for products and services with customers, and to ensure any transaction issues can be dealt with.   | <b>Contractual performance</b>                   | Internally only                      | Maximum 60 years from the date of the completion of the project or contract.  |
|  |  | For accounting and taxation purposes   | <b>Statutory obligation</b>                      | Internally and professional advisers | 10 years from the date the data subject has input personal information but has not proceeded with a project or contract |
|  |  | Documentation should any contractual legal claim arise   | <b>Legitimate Interest</b>                       | Internally and professional advisers | 6 years for VAT records from the performance of the contract  |



| Purpose – Fulfillment Information |   |  |                                |  |  |
|-----------------------------------|---|--|--------------------------------|--|--|
| Fulfillment data                  | Name, Company name physical address, email address, telephone no. | Delivery of product, project or service  | <b>Contractual performance</b> | Internally and any third party logistics or supplier with whom we contract in order to fulfill these requirements. | Maximum 60 years from the date of the completion of the project or contract. |
| Purpose – Communications          |   |  |                                |  |  |
| Contact information               | Name, Company name physical address, email address, telephone no. | To communicate with you about any issues that you raise with us or which follows from an interaction between us. | <b>Legitimate interest</b>     | Internally and as necessary with professional advisors   | Relevant statutes of limitation  |

#### 4. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [whc@whitehorsecontractors.co.uk](mailto:whc@whitehorsecontractors.co.uk) or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

##### **The right to be informed**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

##### **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

##### **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.



### **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

### **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

### **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfillment of a contractual obligation.

### **The right to object**

You have the right to object to our processing of your data where:

- Processing is based on a legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purpose of scientific all historic research;
- Processing involves automated decision-making and profiling

## **5. How do we store your personal data?**

Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

## **6. Do we disclose your data?**

We use a number of third party companies to support our services, some of which may process personal data on our behalf. These third parties have been carefully chosen and all of them have been vetted and comply with UK Data Protection Act (DPA) 2018 and General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR")

## **7. Data Breaches**

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.



## **8. How do we use Cookies?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. It will not identify any personal details.

For more information about our Cookies Policy click [here](#)

## **9. Complaints**

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us>

## **10. Changes to our privacy policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 29<sup>th</sup> May 2018.