

Kempton Smith Limited Privacy Policy

We are Kempton Smith Limited, company number: 09535361 whose principal place of business is 23 Vyner Street, 2nd floor, London E2 9DG, and whose registered address is Dickens House, Guithavon Street, Witham, Essex, England, CM8 1BJ and whose telephone number is 0207 254 4060 (hereafter "we" or "Kempton Smith"). This Privacy Policy describes the way in which we collect and use personal information. For the purposes of Data Protection Legislation, we are the data controller.

This Privacy policy applies to all Clients and Staff of Kempton Smith, potential and actual. In this Privacy policy we refer to Clients and Staff as 'you'.

We make every effort to safeguard your privacy and this policy explains the data processing we do and how we do it.

If you have any further queries on our use of your data, please contact our Data Protection Officer David Duchin at david@kemptonsmith.co.uk

Kempton Smith Limited as a company confirm that all Client and Staff information that we hold is held in a secure and responsible manner. Kempton Smith Limited only access your information in order to provide you with our services and we do not disclose or sell information to any third parties. The information we hold is solely for maintaining our relationships and general communication purposes. As a company we respect your rights and take the security of your data very seriously.

By issuing your personal data to us, you consent to our collecting and retaining your data, using it and contacting you in the ways described in this Privacy Policy.

What information do we collect and store?

We collect the following information:

- Name/ Company Name/ Trading Name
- Individual employees names and titles
- Delivery Address and or Invoice address
- Contact Number/s
- Email Address/s
- Invoice Activity
- Insurance certificates where applicable
- Orders with site specific information
- Bank Details where applicable for accounting purposes

Please note once personal data is no longer needed we will destroy it securely.

What do we use the information for?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

We want to give our clients and Staff the best possible service and need key information to provide our service to you. Therefore, the main use of the information we collect is to enable the core functioning of the services we supply for you and other clients and Staff.

We take secure backups of information held in in our database for disaster recovery purposes. These backups include information provided by you or collected by us as outlined in 'What information we collect' section of this policy.

Any personal information you provide to us will only be used by us, our clients, agents and service providers, and will not be disclosed unless we are obliged or permitted to do so by law.

Other than as described below, we will not pass on your personal details to any third party without your permission.

What information do we share with third parties?

We may share your information with third parties in the following circumstances:

- Property Development Projects and Consultation
- Law Enforcement Agencies: if required to do so by a court order or for the purposes of prevention of crime.
- IT, email & System Administration Service Providers: we use 3rd party IT management service providers. We ensure that all providers adhere to the same level of data protection as Kempton Smith Limited. For the purposes of Data Protection Legislation, these 3rd parties are Data Processors.

Data Retention Periods

We retain the data outlined in the above sections for the following time periods:

- Where we collect data for the operation of our core service, we will retain that data for the entire period of the project, and for 7 years after its completion.
- We retain secure, off-site copies of our data backups for a minimum of 6 months.

Data security

- We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Transferring information abroad or to others

We do not transfer information outside the EEA unless we need to transfer information abroad specifically to ensure that the service you seek is properly provided to you where that service is provided in whole or in part from abroad.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If we sell or otherwise dispose of our business, or part of it in any way, the information will go with it but we will seek similar safeguards for you as these.

Your Rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. You may request that we delete your information by sending an email to us at david@kemptonsmith.co.uk with the heading 'DELETE ACCOUNT'.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain

products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contact Us

If, at any time, you would like to contact Kempton Smith Limited about your views on this Policy, or in relation to your rights in respect of your personal information, you can do so by sending an e-mail to our Data Protection Officer, David Duchin at david@kemptonsmith.co.uk