



Workplace Filing, Change and Move Specialists

Privacy Policy

Last updated: 20/05/2018 Version: v3.0

1.0 Introduction

J G Regan Ltd is dedicated to protecting the confidentiality and privacy of personal data entrusted to us. We comply with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. This applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this Privacy Policy or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person, that is not already in the public domain. J G Regan Ltd processes personal data for numerous purposes to run our business, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

Please read this Privacy Policy to learn about your rights, what information we collect, how we use and protect it.

This document, J G Regan Ltd - Privacy Policy, can be found on our company website, at <u>http://www.jgregan.co.uk</u>

2.0 Who are we?

This Privacy Policy applies to J G Regan Ltd, an office optimisation services company based in West London.

Our principal address is: Ickenham House, 2-4 High Road, Ickenham, Middlesex. UB10 8L J

Company Registered in England & Wales: Registration No: 1955135.

Registered address:

Suite 15, The Enterprise Centre, Coxbridge Business Park, Farnham, Surrey. GU10 5EH

3.0 Why we collect the data

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Professional Services Providing consultancy advice and reports to our clients that are related to making the best use of their available office space, through auditing office space, best practice storage methods and rationalisation; change management and office relocations.
- Responding to communications from individuals for requests for proposals and quotations, servicing our clients' needs.
- Corresponding with our clients Managing our relationships with our clients, responding to enquiries, and to enquiries via our website.
- Developing and improving our business and services, identifying client needs.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Security Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Recruitment Assessing candidates to join our J G Regan Ltd. Team and employing new staff.
- Responding to communications from individuals for requests for proposals and quotations, servicing our clients needs.
- Engaging suppliers or 3rd parties to assist us in delivering our services.



4.0 What data we collect

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy. We may collect any personal information from the categories below:

- Contact details: full name, company name, company address, job title, work and mobile telephone numbers, work and personal email.
- Information provided to us by clients in the course of a professional engagement.
- Information provided via our website email contact address.
- Applicants: CV's from candidates, (e.g. job and career history, educational background and professional memberships).
- Background checks: that may reveal adverse information about potential or existing clients, reveal criminal convictions or offence information.
- Employees: next of kin, emergency contact details, NI number, bank details, (to process payroll
 and pension scheme), passport, visas, proof of residency and right to work details, (to verify id and
 right to work in the UK).

5.0 How we collect the data

- Directly from the data subject:
 - Individuals who provide us with their contact details
 - Make an enquiry from our website email address
 - Via Telephone or email enquiries
 - Completing application forms for jobs,
 - When we are establishing a business relationship,
 - Performing professional services through a contract.
- Indirectly, from a variety of third-party sources:
 - Cookies please see our Cookie Policy on our company website for detailed information regarding what cookies are, how we use cookies to collect personal data, and your rights to opt out of cookies.
 - Public sources e.g., public registers (such as Companies House), news articles, and Internet searches.
 - Business clients to allow us to perform professional services that involve sharing personal data that they control as part of that engagement. For example, we will collect personal data in completing a business review or in preparation and planning for an office move. Minimum information will be kept and only used for the specific purpose contracted.
- Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal data where it is strictly needed for those purposes.
- Where we need to process personal data to provide professional services, we ask our clients as data controllers to provide the necessary information to the data subjects regarding its use. Our clients may use relevant sections of this privacy statement or refer data subjects to this privacy statement if they consider it appropriate to do so.
- Generally, we collect personal data from our clients, or from third parties acting on the instructions of the relevant client.
 - Recruitment services we may obtain personal data about candidates from an employment agency, and other parties including former employers, credit reference agencies, and from background checks.



6.0 What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- By contract we may process personal data in order to perform our contractual obligations.
- By consent we may rely on your freely given consent at the time you provided your personal data to us.
- Legitimate interests we may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced, e.g., delivering our professional services to our clients that they have engaged us to provide.
- Legal obligations and public interests we may process personal data in order to meet legal, regulatory and public interest obligations or mandates.

7.0 Who do we share the data with?

We share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Parties that support us as we provide our services (e.g., providers of telecommunication systems, IT system support, cloud-based software or hosted services),
- Our professional advisers, including lawyers, insurers, book-keeper, accountant, pension provider,
- Payment services providers
- Law enforcement or other government and regulatory agencies (e.g., HMRC) or to other third parties as required by, and in accordance with, applicable law or regulation,
- Recruitment services providers,
- Travel providers.

8.0 Do we transfer your personal data outside the European Economic Area?

We store personal data on servers located both in the European Economic Area (EEA), and the USA. We may transfer personal data to reputable third party organisations situated inside or outside the EEA when we have a business reason to engage these organisations. Each organisation is required to safeguard personal data in accordance with contractual obligations and data protection legislation.

9.0 Personal data security

We have put appropriate technical and organisational security policies and procedures in place to protect personal data from loss or misuse. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information.

Please be aware that the transmission of data via the Internet is not completely secure, particularly for public Wi-Fi and non-encrypted transmission. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

10.0 Do we Use Cookies?

Our website makes use of cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our <u>cookie policy</u>.



11.0 Retention policy

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are contracted or subject to. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for six years. We will dispose of personal data in a secure manner when it is no longer required.

12.0 What are your data protection rights?

Your data protection rights are highlighted here. To submit a data request, please see our Contact Details at the end of this Policy.

<u>Access</u>

You can ask us to verify whether we are processing personal data about you, and if so, to provide what information we have collected.

<u>Correction</u>

You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.

<u>Erasure</u>

You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.

Processing restrictions

You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim.

A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.

Data portability

In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if is technically feasible.

Right to Withdraw Consent

You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

To manage data requests, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it.

No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.



13.0 Who can you contact regarding privacy question or concerns?

If you have any questions or comments about this privacy policy, or how and why we process personal data, please direct your correspondence to: The Data Controller, J G Regan Ltd., Ickenham House, 2-4 High Road, Ickenham, Middlesex. UB10 8L J; or by email to: <u>dataprivacy@jgregan.co.uk</u>. We aim to respond within 30 days from the date we receive privacy-related communications.

You may contact the UK Information Commissioner's Office at <u>https://ico.org.uk/concerns/handling/</u> to report concerns you may have about our data handling practices. Address: Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Tel: 0303 123 1113

14.0 Changes to the Privacy Policy

We may change this Privacy Notice from time to time. However, we will not reduce your rights under this Privacy Policy. We will update the Policy on our website, and will show a revision number and date, to show the current Policy version.