

BURTT-JONES & BREWER Privacy Notice

Last updated: July 2023

1. Introduction

Burtt-Jones & Brewer is a trading name of Burtt-Jones & Brewer Ltd. Burtt-Jones & Brewer specialises in the provision of design and consultancy services to the interior design sector.

Our data processing is limited to the information necessary to provide services to our clients, fulfil contractual obligations and meet legitimate business interests (see section 4).

2. Data controller

Burtt-Jones & Brewer is a data controller, which means that we determine the purpose of collecting data and the ends to which that data is used.

3. Data subjects

For the purposes of this policy, data subjects will be:

- clients (or individual client representatives), representing an organisation who contracts with Burtt-Jones & Brewer for the provision of design and consultancy services
- subcontractors (or individual subcontractor representatives), representing an individual or organisation who contracts directly with Burtt-Jones & Brewer to provide services to us and/or to our clients on our behalf
- contractors (or individual contractor representatives), representing an individual or organisation who contracts directly with Burtt-Jones & Brewer
- suppliers (or individual supplier representatives), representing an organisation or individual who supply goods directly to Burtt-Jones or to our clients
- business contacts, representing individuals or organisations in our network who are of legitimate interest to the normal business activity of Burtt-Jones & Brewer

4. Why we collect this data

We store personal data on one or both of the following lawful bases:



- a. contractual obligations
 - i. to provide services to or carry out our part of a contract with a client
 - ii. to fulfil contractual obligations with our contractors
- b. legitimate interests
 - i. data stored on the basis of legitimate business interests (for example, to maintain or expand our business contacts and network)

5. What data we collect and how it is used

The information we collect on each individual depends on the type of data subject, and the purpose the data is being collected for.

Relevant data to be processed, based on data subject types, will mainly include, but will not be limited to, the following:

According to data subjects:

- clients (or individual client representatives)
 - o names, job titles, email addresses, contact numbers
- subcontractors (or individual subcontractor representatives)
 - names, job titles, email addresses, contact numbers, bank details
- contractors (or individual contractor representatives)
 - names, job titles, email addresses, contact numbers, bank details
 - suppliers (or individual supplier representatives)
 - o names, job titles, email addresses, contact numbers, bank details
- business contacts
 - names, job titles (current/previous), employers (current/previous), email addresses, contact numbers

According to activity:

• Emails and other written communications between Burtt-Jones & Brewer and its data subjects

6. Retention of data

The data we store is periodically reviewed to erase or rectify data when:

- a. the data is no longer needed
- b. the data is inaccurate or out of date
- 7. How the data is collected & processed



All data is collected manually in the course of normal business activity, as and when we identify new data subjects or need to make changes to the existing data we hold.

All data is processed in line with the core principles of the current GDPR legislation.

8. Confidentiality

The confidentiality of its data subjects is of paramount importance to Burtt-Jones & Brewer, and all data will be processed in line with the Integrity and Confidentiality principle of the GDPR.

9. Who is collecting the data & who has access to it

- Who is collecting the data?
- Who will it be shared with?

We collect and process all our data ourselves, and the data is stored on carefully selected platforms and cloud services which meet our data security requirements.

Only persons working for Burtt-Jones & Brewer have access to data, on a need-to-know basis. Data is never shared outside the organisation without the explicit consent of the data subject.

Data users, with access to relevant electronic and paper records, are limited to the Company Directors and the Office Manager, and any subcontractor providing services under the Burtt-Jones & Brewer trading name, on a need-to-know basis only.

All data users are required to treat the data in accordance with this policy.

10. The impact of data collection on data subjects

- What will be the effect of the data collection on the individuals concerned?
- Is the intended use likely to cause individuals to object or complain?

As our data storing and collecting activity is limited to fulfilling our contractual obligations and maintaining our network of contacts, we do not believe that our data subjects should be adversely impacted by our processing activities. However, should anyone wish to discuss or know more, please contact us via email at <u>accounts@burtt-jonesandbrewer.com</u> or by phone on 020 7489 7024.



11. Data subjects' rights

Data subjects have a number of rights in relation to their personal data which we store. In summary, these include:

- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

For more information on each of these rights, please see the Information Commissioner's Office Guidance, available at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-righ ts/

If you have a question about the use of your data, or would like to invoke any of these rights, please feel free to contact us via email at <u>accounts@burtt-jonesandbrewer.com</u> or by phone on 020 7489 7024.

References

The Information Commissioner's Office Guide to the General Data Protection Regulation (GDPR). Available at: <u>https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/</u>

General Data Protection Regulation (GDPR) (EU) 2016/679