

## Privacy Notice for Suppliers including Contractors, Subcontractors and Self-Employed businesses

### 1 The purpose of this notice

Marston Properties takes your privacy seriously and is committed to respecting and protecting it.

This notice describes to you what personal data Marston Properties collects about you, why we need it, how we use it and what protections are in place to keep it secure.

It is Marston Properties policy to:

- Process your personal information fairly and in accordance with GDPR law
- Tell you about how we will use your personal information
- Only collect personal information from you when we need it for legitimate purposes, or legal reasons
- Ensure that personal information held is relevant and not excessive for the purpose for which it is obtained
- Not keep your personal information for longer than we need to
- Keep your personal information secure, and limit the people who can access it
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date
- Ensure that any third parties we share your personal information with take appropriate steps to protect it.

We will use your personal data only for the purposes for which we collected it, unless we fairly consider that we need it for another reason that is compatible with the original purpose. If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. For the purpose of the legislation and your personal data, Marston Properties Limited is the Data Controller and the Directors can be contacted at 1 Mills Yard, Fulham London SW6 3AQ.

### 2 Collecting your personal data

Marston Properties collects and processes personal data relating to its suppliers to manage the supplier relationship. The organisation is committed to being transparent about how it collects and uses that data.

There are 6 lawful bases of processing your data including consent, legitimate interests, contractual necessity, a legal obligation and a vital interest. For each usage of the data the lawful basis of the processing of your data will be identified below. Legitimate interest is when we have a business or commercial reason to process your personal data. Whenever we process your personal data for these purposes, we ensure that your interests, rights and freedoms are carefully considered.

Requirements	Data held includes	Legal Basis
Information to contact you	Name Personal telephone numbers, email addresses	Contractual necessity

Information to confirm tax status	Name, address, National Insurance Numbers, Tax Identifiers, HMRC advice	Legal Obligation
Information to assess your suitability for the contract or order	References, Business Credit or financial reports, Insurance details	Contractual necessity
Information to ensure your health, safety and medical requirements are considered	Health and Safety records Information about medical or health conditions, including whether you have a disability for which we need to make reasonable adjustments	Legal Obligation Consent
Information to process invoices and payments and remittances	Contract Terms, Bank account details, email address, CIS registration status	Contractual necessity
Information to process and report to HMRC / other legislative requirements	Financial Details, CIS registration, Tax Identifiers NINO	Legal Obligation
Information to provide evidence for legal or health and safety claims	Terms of contract Information about health and safety/training	Legitimate Interest to respond to and defend against legal or health and safety claims

### 3 Using your personal data

We will use your personal data only in relation to a lawful basis. Most commonly, we will use your personal data in the following circumstances:

- to enter into a contract with you
- to place an order with you
- to communicate with you
- to maintain accurate supplier records.
- to process invoices and payments
- to comply with insurance, legal and regulatory obligations (e.g. HMRC, CITB etc)
- to ensure compliance with duties in relation to the health and safety of individuals, particularly employees with disabilities

### 4 Sharing your personal data

Your information will be shared internally with the Managing Director, the Financial Director, and authorised employees including the accounts department and the department placing the order or contract. Your information may also be shared with the Marston Properties group companies but will only be used in line with this privacy notice.

Marston Properties also shares your relevant data with third party companies that need to process personal data to provide services to us. This includes:

- HMRC and Government bodies
- Insurance providers
- Professional advisors including auditors and solicitors
- Other suppliers/parties involved with the contract
- Banks
- Third party IT service providers and software systems
- Confidential Waste Disposal Companies

We will ensure that any third parties we share your personal information with take appropriate steps to protect it.

## 5 Protecting your personal data

Your hard copy personal data is stored in locked cabinets. Electronic data is stored on servers and on software systems which are local and cloud based. The back-ups are encrypted and stored with a third party. Marston Properties Limited regularly reviews the security of these systems and holds a Cyber Essentials Security Certificate. We have internal policies in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed. This is controlled by only granting access to authorised personnel to fulfil their roles.

Data held by Marston Properties Ltd is stored within the European Union. The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries for processing to take place, including locations outside of the UK and the European Union. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

## 6 Keeping your personal data

Marston Properties holds different categories of personal data for different periods of time.

We will keep your personal data for as long as you are a supplier of Marston Properties.

After you stop being a supplier of Marston Properties, we may keep your data for up to 7 years to maintain records according to rules that apply to us. We may keep your data longer than 7 years if we cannot delete it due to legal, regulatory or technical reasons. Information related to Health and Safety matters may be held for up to 40 years or longer if required due to the possibility of latent claims under health and safety regulations. Wherever possible we will endeavour to minimise the amount of personal data held and will only use it for those purposes.

## 7 Cookies and tracking

The Marston Properties website and applications may collect data about how you use our services to help us improve future functionality.

Marston Properties use Google Analytics, which is a web analysis service provided by Google. Marston Properties may collect and report on the adoption and usage of specific features, crashes and exceptions and other useful metrics.

## 8 Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request

- Require the organisation to update incorrect or incomplete data
- Require erasure of your data when consent is our basis of processing (the right to be forgotten). You may request that your personal data be erased, for example, where there is no compelling reason for its continued processing or where you withdraw consent. We will comply with your request unless we have another basis of processing justifying our retaining the data (for example a legal requirement or the defence of a legal claim).
- Ask the organisation to stop processing data periodically if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- Where the lawful basis for processing is your consent, you may withdraw consent at any time by writing to: Marston Properties Ltd, 1 Mills Yard, London SW6 3AQ or emailing [info@marstonproperties.co.uk](mailto:info@marstonproperties.co.uk)

## 9. Changes to this privacy notice

We keep our privacy notice under regular review and will post updated versions on our website.