



Policy on Security of Personal Data (Implementation of GDPR)

Joseph Rochford Gardens Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice applies to our individual customers and suppliers, our corporate customers and supplier contacts, and other individuals whose personal contact details we process in the course of our business. It makes you aware of how and why your personal data will be used and stored. This notice does not form part of any contract and may be updated at any time.

General principle

We will comply with data protection law and principles, which means that your data will be:

- Used fairly, lawfully and in a transparent way.
- Collected only for valid purposes that we have made you aware of and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and, where necessary, kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Personal Data collected

Where you are an individual customer or supplier, or a representative of a corporate entity, we may collect, store, and use your personal contact details such as name, title, addresses, telephone numbers, and email addresses.

We may also store payment details you have provided for us to take payment from you, or to make payment to you.

Use of Personal Data, including Data sharing

In the course of business, we may need to use your personal information to contact you and/or to facilitate our business relationship with your employer. It is in our legitimate interests to use your data in this way in the course of business. In certain circumstances we may be required to share information about you with a third party in order to perform or enforce our contract with you, or your employer. There may also be situations in which we have a legal obligation to disclose information.

Where you are an individual customer or supplier, we will use your details to perform the contract between you and us. We will not use your data for marketing purposes without your specific permission.

Data security

Your data, provided to us in the course of our business to business relationship, will be recorded electronically in our databases. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your

personal information on our instructions and they are subject to a duty of confidentiality. Limited personal data may be uploaded to our order scanning APP and to our website. We will ensure that appropriate security measures are in place to secure data used in this way.

We have procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your Rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

We are not able to amend or delete data that relates to sale or purchase transactions where the information is required for accounting and HMRC purposes.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at accounts@rochfords.net. We do not have to comply with your request but we would explain why if we believe we are entitled to refuse.

You have the right to complain if you feel your rights have been breached in any way to the Information Commissioner's Office (ICO) – full contact details available on www.ico.org.uk

Changes to this Data Privacy Policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. A current version of this policy will be available on our website www.rochfords.net. We may also notify you in other ways from time to time about the processing of your personal information.