



JEWELLERS
OF
EXCELLENCE
PRIVACY NOTICE

Introduction

This notice explains how we use personal information about you which we collect in the course of your employment with us Jewellers of Excellence, in accordance with the General Data Protection Regulation (GDPR).

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

The Kind of Information We Hold About You

Personal data means any information about an individual which allows that individual to be identified.

We collect, store and use the following categories of personal data:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses
- Photographs

How is your Personal Information Collected?

We typically collect personal information about customers through our email sign up and contact form.

Data Sharing

Do We Share Data with Third Parties?

Houlden will only share information with; internal company employees.

How Secure is my Information with Third Party Service Providers?

All our third party service providers are required to take appropriate security measures to protect your personal information. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

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 and 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 information on our instructions and they are subject to a duty of confidentiality.

Data Retention

How long will we keep your information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, insurance, accounting or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from Office Manager. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk or harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal



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data and whether we can achieve those purposes through other means, and the applicable legal, insurance and compliance requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member or supplier of the company we will retain and securely destroy your personal information in accordance with our data retention policy, if we no longer have a legitimate reason for retaining it.

Rights of Access, Correction, Erasure and Restriction

Your Duty to Inform us of Changes

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.

Your rights in connection with personal information.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a data subject access request). 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 your 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.
- **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.
- **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.

If you want to review, verify or 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 Office Manager in writing.

No Fee is Usually Required

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

What we May Need from You.

We may need to request specific information from you to help us confirm your identity and ensure you right to access the information (or to exercise any of your other rights). This is another appropriate security to measure to ensure that personal information is not disclosed to any person who has no right to receive it.



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Right to Withdraw Consent

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Office Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agree to, unless we have another legitimate basis for doing so in law.

Data Breaches

We are required under the GDPR to notify you without undue delay of any data breach which is likely to result in a high risk to your rights and freedoms.

Your Right to Complain

If you have a complaint about the way in which your data has been handled please contact Office Manager. You also have the right, in certain circumstances, to report concerns about data management to the Information Commissioner's Office and information is available at www.ico.org.uk.

Changes to this Privacy Notice

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 substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Office Manager:

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