

# Notification for Suppliers and Contractors

Cluttons LLP on behalf of its subsidiary companies, associated undertakings and licensees is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Cluttons LLP of Yarnwicke, 119-121 Cannon Street, London, EC4N 5AT.

## NATURE OF DATA

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We may collect and process the following data about you:

- Contact details
- Bank details
- VAT details
- Records related to Health & Safety or accidents at work

## SOURCE OF INFORMATION

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We may receive and process information about you from:

- yourself (data you provide)
- ourselves (data we generate)
- your bankers
- Alcumus Group Limited (SafeContractor.com)

## LAWFUL BASIS

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Our lawful basis for processing this data is

- our legal obligations (including our obligations under the Finances Act 2008)
- our contract with you

The consequences for you if we are unable to process this data would be:

- we would not be able to continue with our contract with you

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## RETENTION

Any data related to financial transactions will be retained for 7 years to conform with our legal obligations regarding record keeping under the Finance Act 2008.

Any data related to health and safety may be retained for up to 25 years to conform with our legal obligations under health and safety legislation such as the Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 2013.

Other data may be kept for up to 7 years from termination of the contract in case there are queries, unless you request that we delete the data beforehand.

## RECIPIENTS

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To the extent that is necessary to manage and satisfy our contract your data may be shared with:

- our software and IT service providers
- tenants and landlords
- your and our bankers
- the Health and Safety Executive

## USES MADE OF THE INFORMATION

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We use information held about you in the following ways:

- negotiation and management of our contract with you
- recording financial transactions
- arrangements regarding repair and maintenance
- record keeping for Health & Safety

## DISCLOSURE OF YOUR INFORMATION

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Where we may occasionally be required to disclose certain information to additional third parties, we will disclose data only when and to the extent that we have a legal obligation to do so.

Such third parties may include:

- law enforcement authorities
- courts, tribunals or other judicial bodies
- local authorities
- the Health and Safety Executive

## TRANSFER OUTSIDE THE EEA

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We do not transfer your data outside the European Economic Area.

## YOUR RIGHTS

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You have the following qualified rights with regard to your personal data:

- Access – you may request we provide you with the data we hold
- Rectification – you may request we correct any inaccurate data
- Erasure – you may request we erase your data
- Restriction – you may request we stop processing your data but retain it
- Objection – you may object to us processing your data
- Portability – you may request we provide you or a nominated party with your data in a commonly used, structured and machine-readable format

You can exercise your rights at anytime by contacting us at [cs@cluttons.com](mailto:cs@cluttons.com)

You also have the right to lodge a complaint with the [Information Commissioner's Office](#) or any other [European Supervisory Authority](#).

## CHANGES TO THIS NOTIFICATION

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Any changes we may make to this notification in the future will be posted on this page and where appropriate notified to you by e-mail.

## CONTACT

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Questions, comments and requests regarding this notification are welcomed and should be addressed to: [cs@cluttons.com](mailto:cs@cluttons.com)