

## Privacy Policy

William King Ltd and Mi-King Ltd (both individually defined going forward as “**the company**” and together as “**the group**”) are committed to protecting and respecting the privacy of our visitors and are bound by data protection laws including the Data Protection Act 1998 and the General Data Protection Regulation (GDPR). We issue this privacy notice in the interests of transparency over how we use (“**process**”) the personal data that we collect from you when you visit or communicate with our sites or personnel.

### What Personal Information we collect from you?

During your visit or communication with our sites or personnel we may collect personal information about you such as

- Contact information such as your name, company name, job title, address, email address and phone number following an enquiry
- Information you provide when applying for a vacancy at the company when you complete an application form or forward a CV

Like other website, data is also gathered via cookies.

### Cookies

Data gathered will not identify you personally. It is strictly aggregate statistical data about our visitors and how they used our resources on the site. No identifying personal information will be shared at any time via cookies.

You may elect to decline all cookies via your computer. Every computer has the ability to decline file downloads like cookies.

### Purpose of collecting the data

The information you provide us may be used in a number of ways, for example:

- To provide you with the information, products and services you ask for, and honour any contract you have with us
- To enable us to identify the individual for the purposes of recruitment

Our legal basis for processing personal data provided to us is that:

1. Processing the personal data is necessary to take steps to enter into an employment contract;
2. Processing is necessary to comply with a legal obligation (for example we are obliged under employment law to issue a written statement of employment terms which identifies the parties involved in the employment contract);
3. Processing the data is necessary to protect the vital interests of an individual (for example we are legally responsible for the health and safety of job applicants and other visitors (when they are on our premises) and so it is necessary to process data relating to those individuals for that reason); and/or
4. Processing the data is necessary for the purposes of our “**legitimate interests**” as the data controller (except where such interests are overridden by the interests, rights or freedoms of the individual).

Our “legitimate interests” for these purposes are:

1. the need to process data on applicants and staff for the purposes of assessing suitability for employment and then carrying out the employment contract;
2. the need to gather data for the purpose of safeguarding the health and safety of job applicants and employees;
3. the need to transfer employee data within the group for administrative purposes; and
4. the need to process employee data for the purposes of ensuring information technology and computer systems security.

There is no strict statutory or contractual requirement for you to provide data to us but if you do not provide at least that data that is necessary for us to assess suitability for employment and then to conduct the employment relationship then it will not practically be possible for us to employ you.

### **Who will be share your personal information with**

Your personal data may be shared with:

1. If appropriate, other members of our group of companies
2. In the case of job applicants, our HR department, the interviewer and prospective manager;
3. In the case of health and safety information, the Health and Safety and Environmental Manager, a Company Director and the HR department;
4. Appropriate external regulators and authorities where reporting is mandatory or a legal requirement.

We do not envisage that your data would be transferred to a third country (non EU or EEA member). If we perceive the need to do that we would discuss that with you and explain the legal basis for the transfer of the data at that stage.

### **Duration of storage of personal data**

We will keep personal data for no longer than is strictly necessary, having regard to the original purpose for which the data was processed. In some cases we will be legally obliged to keep your data for a set period.

### **Security of Information**

We are committed to protecting the security of the personal information collected, and we take reasonable physical, electronic and administrative safeguards to help protect the information from unauthorised or inappropriate access or use. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

### **Your rights in relation to your personal data**

#### **1. The right to be forgotten**

You have the right to request that your personal data is deleted if:

- a) it is no longer necessary for us to store that data having regard to the purposes for which it was originally collected; or
- b) in circumstances where we rely solely on your consent to process the data (and have no other legal basis for processing the data), you withdraw your consent to the data being processed; or
- c) you object to the processing of the data for good reasons which are not overridden by another compelling reason for us to retain the data; or
- d) the data was unlawfully processed; or
- e) the data needs to be deleted to comply with a legal obligation.

However, we can refuse to comply with a request to delete your personal data where we process that data:

- a) to exercise the right of freedom of expression and information;
- b) to comply with a legal obligation or the performance of a public interest task or exercise of official authority;
- c) for public health purposes in the public interest;
- d) for archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- e) the exercise or defence of legal claims.

#### **2. The right to data portability**

You have the right to obtain the personal data which you have provided to us, in a structured, commonly used and machine-readable format, so that you can move, copy or transfer this data to another IT environment in a safe and secure way, without hindrance to usability. This right applies where the

processing is based on your consent or on a contract and the processing is carried out by automated means.

### 3. The right to withdraw consent

Where we process your personal data in reliance on your consent to that processing, you have the right to withdraw that consent at any time. You may do this in writing to the HR team or to your line manager.

### 4. The right to object to processing

Where we process your personal data for the performance of a legal task or in view of our legitimate interests you have the right to object on “grounds relating to your particular situation”. If you wish to object to the processing of your personal data you should do so in writing to HR or to your line manager stating the reasons for your objection.

Where you exercise your right to object we must stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

### 5. The right of subject access

So that you are aware of the personal data we hold on you, you have the right to request access to that data. This is sometimes referred to as making a “subject access request”.

### 6. The right to rectification

If any of the personal data we hold on you is inaccurate or incomplete, you have the right to have any errors rectified. Where we do not take action in response to a request for rectification you have the right to complain about that to the Information Commissioner’s Office.

### 7. The right to restrict processing

In certain prescribed circumstances, such as where you have contested the accuracy of the personal data we hold on you, you have the right to block or suppress the further processing of your personal data.

### 8. Rights related to automated decision making and profiling

The Company does not normally use automated decision making processes including profiling, i.e processes without human intervention (such as decisions made via website calculations using wholly automated processes). Where profiling is used to assist a process, for example recruitment and personal development, it is always used in conjunction with human intervention and other information.

## **Complaints**

Where you take the view that your personal data are processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority in the UK is the Information Commissioner’s Office.

## **Changes to the Privacy Notice**

We aim to keep the Privacy Notice under regular review and we may therefore change it at any time. This notice was last updated on 22 May 2018.

## **Contacting Us**

Please contact us if you have any questions about our privacy notice or information we hold about you.

By email: [wkhr@williamking.co.uk](mailto:wkhr@williamking.co.uk)

Or write to us at William King Limited, Atlas Centre, Union Road, West Bromwich, West Midlands B70 9DR