	Head office	Standing Instruction	PP-AD-06-01
		Revision #	1
		Implementation Date	July 2018
Page #	5	Last Reviewed/Update Date	July 2018
Owner	David Arbuckle	Approval	Mick Barker

CUSTOMER AND SUPPLIER PRIVACY NOTICE

BACKGROUND

Novograp Ltd having a place of business at 10 Langlands Place, Kelvin South Business Park, East Kilbride, South Lanarkshire, G75 0YF understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers/ suppliers/ sub contractors and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. What Does This Notice Cover?

This Privacy Information explains how Novograp use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

2. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.


Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

3. What Are My Rights?

Under the GDPR, you have the following rights, which Novograp will always work to uphold:

- a) The right to be informed about collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact Novograp to find out more or to ask

	Head office	Standing Instruction	PP-AD-06-01
		Revision #	1
		Implementation Date	July 2018
Page #	5	Last Reviewed/Update Date	July 2018
Owner	David Arbuckle	Approval	Mick Barker

any questions using the details in Part 10.

- b) The right to access the personal data Novograp hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact Novograp using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask Novograp to delete or otherwise dispose of any of your personal data that Novograp has. Please contact Novograp, see details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Novograp using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to Novograp directly, and this data is being used with your consent for the performance of a contract, and that data is processed using automated means, you can ask for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. Novograp do not use your personal data in this way


For more information about our use of your personal data or exercising your rights as outlined above, please contact Novograp using the details provided in Part 10.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

4. What Personal Data Do You Collect?

Novograp may collect some or all of the following personal data (this may vary according to your relationship with Novograp):

- Name;
- Date of birth;
- Gender;
- Address;

	Head office	Standing Instruction	PP-AD-06-01
		Revision #	1
		Implementation Date	July 2018
Page #	5	Last Reviewed/Update Date	July 2018
Owner	David Arbuckle	Approval	Mick Barker

- Email address;
- Telephone number;
- Business name;
- Job title
- Payment information;

5. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data.

Acceptable lawful basis are:-

(a) Consent: you have given clear consent for us to process your personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with us, or because you have asked us to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).


(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you or your business. Your personal details are required in order for Novograp to enter into a contract with you.
- Personalising and tailoring Novograp products and/or services for you.

	Head office	Standing Instruction	PP-AD-06-01
		Revision #	1
		Implementation Date	July 2018
Page #	5	Last Reviewed/Update Date	July 2018
Owner	David Arbuckle	Approval	Mick Barker

- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information that you have opted-in to (you may unsubscribe or opt-out at any time by writing to us telling us so).

6. How Long Will You Keep My Personal Data?

Novograp will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

7. How and Where Do You Store or Transfer My Personal Data?

Novograp will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- Password protecting all electronic systems. Secure storage and destruction of non-electronic media

8. Do You Share My Personal Data?


Novograp will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, Novograp may be legally required to share certain personal data, which might include yours, if Novograp are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. How Can I Access My Personal Data?

If you want to know what personal data Novograp have about you, you can ask Novograp for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell Novograp everything we

	Head office	Standing Instruction	PP-AD-06-01
		Revision #	1
		Implementation Date	July 2018
Page #	5	Last Reviewed/Update Date	July 2018
Owner	David Arbuckle	Approval	Mick Barker

need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Novograp administrative costs in responding.

Novograp will respond to your subject access request within one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

10. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: hello@novograp.co.uk

Telephone number: +44 (0) 1355 900100

11. Changes to this Privacy Notice

Novograp may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.