



# Privacy Notice for Business Partners

# PRIVACY NOTICE FOR BUSINESS PARTNERS

## About this privacy notice

The NG Bailey group of companies, which includes NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited, The Freedom Group of Companies Limited, Denton Hall & Estate Limited and NGBF Holdings Limited (“we”, “us”, “NG Bailey”) takes the protection of your personal data very seriously and is committed to Data Protection and Information Security in accordance with the UK General Data Protection Regulation (“UK GDPR”).

This notice applies to all prospective, current and former clients, subcontractors, suppliers, agents and other third party representatives of NG Bailey.

This privacy notice explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

We may update this notice at any time, which will be available to view in its latest form, at any time, on our website, [www.ngbailey.com](http://www.ngbailey.com) or, on request, to [data@ngbailey.co.uk](mailto:data@ngbailey.co.uk).

## Information about you

NG Bailey operates through a number of companies including the one with which you may be, are or have been engaged.

Prior to and during the course of your business relationship with us you may provide personal information about yourself, your employees or other individuals for whom you control or process their personal data, by a number of means such as on hard copy or electronic forms, via online systems or through various forms of correspondence or orally. This information is known as ‘personal data’, such as name, address, e-mail address and telephone number, and may include what the UK GDPR defines as ‘sensitive personal data’, which is biometric data collected on CCTV footage or other electronic means such as photographs or swipe cards, and information about health, sexual orientation, trade union membership, religious or other beliefs, racial/ethnic origin or criminal convictions or proceedings.

## How we use your information and why?

NG Bailey will process your data as part of a contractual obligation for the purposes of recruitment, employment, record keeping, management of the business, operational processes and our business activities, such as contract administration, compliance with legal obligations and for other more specific purposes as set out below.

Due to the nature of our operations we may disclose and share personal data with other NG Bailey companies who may jointly process such information for the purposes described in this notice.

NG Bailey may process personal data (including sensitive personal data) that you provide for the purposes of monitoring the demographics of its workforce, including racial or ethnic origin, gender, age and disability. Such processing is undertaken solely for the purpose of understanding the demographics of the NG Bailey workforce and will not be used to make any decisions affecting our contractual relationship with you.

If you provide personal data for the purpose of job opportunities with NG Bailey, the data may be used to notify you about other/future job opportunities.

On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. Otherwise, we will only use sensitive personal information with your explicit written consent.

Where relevant, internet and e-mail usage may be monitored or recorded in accordance with NG Bailey ICT policies for quality control, training, compliance and security purposes. Telephone usage may be monitored and recorded for administrative purposes. Therefore, personal data about you may be processed in the course of such monitoring and/or recording.

## **Who we share information with**

NG Bailey sometimes uses external third party providers for the provision of certain aspects of its administration functions and operational processes and also for the provision of professional services, such as legal and financial advice and insurance-related services. This means that NG Bailey may share your personal data with such external organisations in order that they may provide their services.

NG Bailey may disclose personal data to third parties in order to comply with a legal or regulatory obligation.

NG Bailey supplies services to various clients who may require certain information such as the name, role, professional qualifications, certifications and any licences of individuals for whom you have provided personal data, and other information as may be specifically requested by the client or prospective client. In these circumstances, NG Bailey will provide your personal data to prospective clients (for example in bid documents), to existing clients (for example for site security) and to any third parties appointed by such clients to undertake verification processes. Such information is provided by NG Bailey in order to demonstrate to relevant clients that NG Bailey is using appropriately qualified and experienced individuals on relevant sites and projects or to comply with the reasonable requirements of a client in relation to a particular project.

NG Bailey supplies services to various clients where security clearances, identity verification or criminal convictions information is required. In such circumstances, NG Bailey may request certain data of individuals for whom you have provided personal data which will be passed on to relevant third parties and other end clients or regulatory authorities, who may also ask for further data in their own right. NG Bailey will not process this data except for the specific purpose of obtaining the required clearances/verifications. Some elements of this data may be retained for administrative purposes. In general, we will not process particularly sensitive personal information about individuals unless it is necessary for performing or exercising obligations or rights in connection with employment or for the purposes as described above.

## **NG Bailey's assurance to you**

All information that is obtained will be processed by NG Bailey in accordance with UK GDPR and shall only be processed by individuals within NG Bailey or its appointed third party providers or other representatives as explained in this notice, as required by law, as required to perform our obligations to you, or as is strictly necessary.

All our third-party service providers and other representatives are required to take appropriate security measures to protect your personal information in line with UK GDPR.

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.

NG Bailey may transfer personal data to locations outside the European Economic Area (“EEA”), for example, to service providers. If this occurs, NG Bailey will take steps to ensure that the confidentiality and security of your personal data is protected to the same levels of protection that we are required to apply to information held in the UK.

## Your rights

Under the UK GDPR, you have a number of ‘rights’, to ensure that your personal information is being managed appropriately. Specifically, you have the right:

- To be informed (about the processing of your data)
- Of access (to the information we hold)
- To rectification (of any errors on the information we hold on you)
- To erasure (of information we hold, following the statutory period for which we are obliged to hold data)
- To object (to the ongoing processing of information)
- To be aware of any processing where automated decision-making and profiling (using your information) takes place
- To ask us to transfer the information to another organisation.

You have a right to exercise these rights at any time.

## Your confirmation to NG Bailey

You confirm that all personal information you provide to us is accurate and current. Please keep us informed if any personal information changes during your working relationship with us.

We are only responsible for the privacy practices and security of our systems. If you provide NG Bailey with information about any individuals, you retain responsibility for the control of their personal data and confirm that they have agreed and/or appointed you to provide the information and to consent to the processing of their personal data, and that you have informed them of our identity and the purposes for which their personal data will be processed.

## How long we hold this information

The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law, or until such time that you wish to request for your information to be erased.

Details of retention periods for different aspects of your personal information are available in our Document Retention and Destruction Policy which is available on request to [data@ngbailey.co.uk](mailto:data@ngbailey.co.uk).

## Who should you contact and where to make a complaint

If you would like to speak to someone about the UK GDPR, your personal data and your rights, you should direct your questions to [data@ngbailey.co.uk](mailto:data@ngbailey.co.uk) or to our Head of Legal at [legal@ngbailey.co.uk](mailto:legal@ngbailey.co.uk).

If you prefer to speak directly to the Information Commissioners Office (ICO) then they can be reached at [www.ico.org.uk](http://www.ico.org.uk)

If you have a complaint regarding any aspect of your personal data or this privacy notice, please email [data@ngbailey.co.uk](mailto:data@ngbailey.co.uk). If you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

You can also contact the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email/>

#### Version Control

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