



Nortronic Cable Harnessing Limited
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NORTRONIC CABLE HARNESSING LTD

PRIVACY POLICY

DOC LOCATED IN GDPR FILE
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Personal Data

“Personal Data” is data which relates to a living individual who can be identified from that data.

Identification can be by the information alone or in conjunction with any other information in Nortronic Cable Harnessing’s (known as Nortronic) possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “GDPR”).

This privacy notice describes the personal information Nortronic may hold about you, the reasons why it held, what Nortronic might do with the data. If you have any questions about this privacy notice, then please contact Nortronic. They can be contacted either via email to: info@nortronic.co.uk or via post to the address below.

This privacy note is current as of 25 May 2018, and it may be updated from time to time. Accordingly, you are advised to check this section for changes.

Who we are

Nortronic Cable Harnessing Limited (“Nortronic”) is the data controller. This means Nortronic decides how your personal data is processed and for what purposes.

Nortronic is registered at Unit S1, Herald Park Industrial Estate, Herald Drive, Crewe, Cheshire, CW1 6EA

Nortronic complies with our obligations under the GDPR by:

- taking steps to ensure personal data is up to date
- storing it securely, and destroying it when necessary
- taking steps to ensure we do not collect or keep more personal data than necessary
- taking technical and practical steps to protect personal data, so that it is kept secure and is not lost or inadvertently/unlawfully disclosed or accessed
- taking steps to ensure that you are aware of what we do with personal data
- giving you the opportunity to change how, what or whether we hold personal data about you (subject to the terms of this privacy notice).

How Nortronic uses Personal Data

How personal information is collected, held and processed depends upon the type of information we hold – that is, who provided it, and why it is needed.

1. Personal Data about individuals applying for roles (“Candidate Information”)
2. Personal Data about individuals who work for Customers or Suppliers (“Customer Information”)
3. Personal Data about our current and former employees (“Employee Information”)

Candidate Information

Nortronic may hold the following information about Candidates

- contact details (address, telephone numbers and email)
- work history (including references)
- details of qualifications and experience

How we obtain Candidate information

1. It may be provided by the Candidate
2. The Candidate's referees' (in respect of work history or qualifications)
3. Third party websites, where a Candidate has posted their CV/resume or other details of their qualifications/experiences for consideration for roles.

This information is held for the following purposes:

- To consider a candidate for current or future roles

Customer Information

Nortronic may hold the following personal information about Customers

- Name
- Contact details (work address, telephone numbers and email)

How we obtain Customer information

1. It may be provided by the Customer
2. Third party websites, where a Customer's contact details have been posted

This information is held for the following purposes:

1. To consider whether a Customer may wish to receive services from Nortronic
2. To manage the provision of services by Nortronic to the Customer (or vice versa in the case of a Supplier)

Employee Information

If you have any questions in relation to the personal information being held about you by Nortronic or would like to make any changes, please refer in the first instance to the Employee Handbook.

Nortronic may hold the following information about Employees

- Contact details (address, telephone numbers and email)
- Work history (including references)
- Details of qualifications and experience

Details of your employment with Nortronic, including:

- Remuneration and benefits
- Hours, dates worked
- Performance record
- Disciplinary record
- Absenteeism
- Skills & training record

How we obtain Employee information:

The information may be provided by:

- The Employee
- Nortronic's Directors

This information is held for the following purposes:

1. To consider the Employee's suitability in their current/most recent role (the "legitimate interest" basis)
2. To consider the Employee for alternative current or future roles (the "legitimate interest" basis)
3. To manage the employment relationship, including the calculation and payment of salary and benefits (the "legitimate business interest" basis)
4. To comply with employment laws and regulations (the "legal obligation" basis).

Transfers of Employee Information

Nortronic uses most information for its internal purposes only – that is, to manage its rights and obligations in its employment relationship with you.

Nortronic may transfer Employee Information to the following entities for the following specific purposes, which are also lawful under Article 6 of the GDPR):

1. To a third party provider or payroll services or employee benefits, in order to facilitate payment to the Employee (in accordance with the "contract" basis for processing data under the GDPR)
2. To the police, court or regulatory bodies (in accordance with the "legal requirement" basis for processing data under the GDPR)
3. To third parties if we receive a request for a reference (where requested by you, this would be on the basis of "consent", and where required by law this would be on the basis of "legal requirement")
 - treat all data securely
 - process them in accordance with the GDPR (or the EU's approved standard model contracts or other approved basis, if the provider is outside of the EU);
 - use the data only in relation to Nortronic, and not sell or transfer personal information to any third parties.

How long we keep your Personal Data

Nortronic stores Personal Data for periods which are necessary and reasonable depending upon the nature of the data, and the reason for which it is being stored. The following table sets out the current retention periods being used by Nortronic for Personal Data held for various purposes. Please note, these periods are subject to review and the table may be amended from time to time:

Reason	Retention Period
If you have provided services to, or on behalf of Nortronic	7 years from conclusion
If you have received services from Nortronic	7 years from the last date on which services were provided
If you were employed by Nortronic	7 years from the termination of your employment
If you registered your CV with Nortronic but did not take up a role application	3 years from the date on which your most recent application was unsuccessful
If you applied for a role but did not provide services	3 years from the date on which your most recent application was unsuccessful

Please note, the above retention periods are in relation to Nortronic's active records only.

This means that Nortronic will not contact you in relation to providing services after the above dates.

If you wish Nortronic to contact you after these dates, you will have to renew your contact with Nortronic, and resubmit any personal information provided.

Please note, in addition to the above retention periods, Nortronic may retain archive copies of personal information beyond those dates, solely in relation to handling legal claims or legal requirements. It will not be sold or transferred or otherwise used for alternative purposes.

Procedural and Technical Safety Measures

In order to ensure all Personal Data is held securely, Nortronic has the following procedural and technical safety measures:

- all data provided to Nortronic is stored on secure servers that are based on site.. Appropriate security protection measures for all forms of data protection and business continuity are in place.
- access to the Nortronic's systems is controlled by secure login procedures. Access permissions are restricted and controlled. Usernames and passwords are to be uniquely assigned to named individuals and regularly changed to ensure protection.
- all websites operated by Nortronic are protected with Standard Secure Layer (SSL) Encryption Technology. Where external user access is provided to any part of our websites we issue secure access passwords.

Contacting us about Personal Data we hold

If you want to contact us in respect of this policy, or the data we may hold about you, we can be reached at the following email address: info@nortronic.co.uk

Or via post to: Nortronic Cable Harnessing Ltd, Unit S1, Herald Park Industrial Estate, Herald Drive, Crewe, Cheshire, CW1 6EA

In addition to general questions you may have about either this policy or our processing of personal data, you may wish to ask about the following:

- 1) Receiving copies of certain personal data (“Relevant Information”) we hold about you
 - a. This is known as a “data subject access request”. If you would like to make a data subject access request:
 - i. You must write to: Nortronic Cable Harnessing Ltd, Unit S1, Herald Park Industrial Estate, Herald Drive, Crewe, Cheshire, CW1 6EA informing us that you are making such a request. In order to ensure that we only provide copies of information to you, please enclose a certified colour copy of either your passport or driving licence.
 - ii. Nortronic will carry out a reasonable search for Relevant Information held, so when making the request, it would be helpful for you to be as specific as possible in respect of the information you are seeking: for example, in terms of periods covered, and types of data held. This makes it more likely that Nortronic can locate the information which is most relevant for you. If you do not provide any detail as to the information you are seeking, Nortronic may contact you to ask for further details about your request.
 - iii. The search will be carried out within a month of receiving the confirmation set out in points i) and ii) above, unless the search you have requested is particularly complex, or the amount of information is unusually large (we will inform you of such within the month).
 - iv. Relevant Information is information on Nortronics’s electronic or manual files which is about you. This means that it will be information which records something tangible about you, rather than just listing your name. For example, a manual file recording your personal details is likely to be Relevant Information, whereas your email address being in a list of numerous other recipients of an electronic mail shot is unlikely to be Relevant Information.
 - v. There are various exemptions which mean that your personal information may not be disclosed as Relevant Information. These can be found on the Information Commissioner’s Website <https://ico.org.uk>, but some common exemptions are when the information contains a third party’s personal information (and such third party does not consent to disclose such), where searching for and disclosing information requires a disproportionate effort, or where a document has legal professional privilege.

2) Updating or amending personal data we hold about you

- a. if you believe the Personal Data we hold is inaccurate or out of date, we would be grateful if you could let us know. This will also help ensure that Nortronic is not processing incorrect data about you.
 - i. To update or amend your Personal Data please contact us either via email to info@nortronic.co.uk or via post to: Nortronic Cable Harnessing Ltd, Unit S1, Herald Park Industrial Estate, Herald Drive, Crewe, Cheshire, CW1 6EA.
 - ii. Nortronic may ask to verify your identity.
 - iii. Within one month of receiving such verification, Nortronic will review the amended or updated information provided by you, including where relevant, asking for confirmation/verification from relevant third parties.
 - iv. If there is a delay in verification or otherwise amending the Personal Data, Nortronic will contact you within the one month period, explaining the grounds for any such delay.
 - v. Once the updated or amended information has been verified, Nortronic shall amend its systems accordingly. The expired/inaccurate Personal Information shall be removed from the active systems, but a copy may be retained for archive and maintenance of records only (see “Legal Obligations” basis for processing).
 - vi. Please note, during any period of verification your Personal Data will continue to be processed in the unamended form until verification has been complete.
 - vii. At the end of any verification, Nortronic shall contact you to inform you how your Personal Data has been updated/amended.

3) You have the right to request for your Personal Data to be blocked, pending the above requests. This would mean that Nortronic would not contact you about any roles or otherwise process your data (save to the extent necessary to meet its legal or regulatory obligations, or deal with actual or potential litigation), until the above steps have been completed. removing your consent for Nortronic to process certain data about you

- a. Nortronic processes certain information on the “consent basis”:
 - being put forward for a role;
 - being placed on Nortronics’s records for consideration for roles;
 - in order to provide a reference.
- b. You are free at any time to amend or withdraw your consent to all or part of the relevant processing. If you wish to do so, the following process applies:
 - i. You must contact Nortronic at info@nortronic.co.uk informing us that you have changed your consent preference in respect of one or more of the above areas.
 - ii. Nortronic will respond within 10 working days, to verify your identity and request.

- iii. Once your identity and request has been acknowledged and confirmed, Nortronic will amend its system processes in relation to your Personal Data accordingly. Please note, if you withhold or withdraw your consent, Candidate Information will not be used or transferred for the purpose of searching for appropriate roles (that specific type of processing), or in relation to the offering or provision of training courses. However, the Personal Data may continue to be stored and processed by Nortronic, if and to the extent necessary to fulfil its other obligations as set out elsewhere in the policy (for example, in relation to legal claims or in relation to financial record keeping) – such further processing will be on one of the lawful basis set out at the start of the policy.
 - c. When making the above request, you may also request for your Personal Data to be blocked, pending the above steps. This would mean that Nortronic would not contact you about any roles or otherwise process your data (save to the extent necessary to meet its legal or regulatory obligations, or deal with actual or potential litigation), until the above steps have been completed.
- 4) Requesting that Nortronic transfers your personal data to another entity.
- a. Where you have provided Nortronic with Personal Data, you can request that Nortronic transfers that Personal Data to a third party (for example, another employment agency) (the “Transferring Data”). In order to do this, the following process applies:
 - i. You must write to Nortronic Cable Harnessing Ltd, Unit S1, Herald Park Industrial Estate, Herald Drive, Crewe, Cheshire, CW1 6EA providing details of the third party to whom you wish Nortronic to transfer the “Transferring Data”).
 - ii. The Transferring Data should include Personal Data which:
 - 1. is processed via an automated means; and
 - 2. you provided to Nortronic; and
 - 3. has been processed under the lawful basis of either:
 - a. “consent” or
 - b. “contract”.
 - iii. Nortronic will contact you within 10 working days to confirm the fact and details of your request.
 - iv. Once Nortronic has received the above confirmation, Nortronic will make a copy of the Transferring Data on a commercially generally available format (for example Microsoft Word, Microsoft Excel) and will send a copy to the contact details you have provided.
 - v. After carrying out step iii) above, Nortronic will send you an email confirming what Personal Data was transferred to the third party.
 - b. When making the above request, you may also request for your Personal Data to be blocked, pending the above steps. This would mean that Nortronic would not contact you about any roles or otherwise process your data (save to the extent necessary to meet its legal or regulatory obligations, or deal with actual or potential litigation), until the above steps have been completed.