

# Quality System Section

## Section 3: Policies

 <b>Quality Management System</b>	
<b>Ref: QMS-P09</b>	<b>Issue: 1</b>
<b>Date: August 2020</b>	<b>Author: DR/SS</b>
<b>Issue to: All staff</b>	

## Privacy Policy

At Middlemarch Environmental, we want to protect and respect your data and your privacy.

This Privacy Policy explains when and why we collect personal information about individuals, including those who visit our website and use our services. In this Privacy Policy we will detail how we use personal data, the conditions under which we may disclose it to others and how we keep it secure.

By using our website, you are agreeing to be bound by this Privacy Policy.

### 1. WHO ARE WE?

Middlemarch Environmental Ltd (“Middlemarch”) is an Ecological Consultancy based in Coventry, with regional offices across England. Middlemarch is a private limited company (no. 2593908). The registered address is Brandon Lane, Coventry CV3 3GW.

### 2. HOW DO WE COLLECT INFORMATION ABOUT YOU?

By using our website, we may obtain information about you, for example when you sign up to a newsletter or when you make an enquiry. We also place a tracking code (or “cookies”) on our website for Google Analytics to gain insight into your navigation of our website. We cannot identify you from this tracking code. We use the data collected to help Middlemarch develop its website, products and user experience.

#### Use of ‘cookies’

‘Cookies’ are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

For more information on Google Analytics: <https://policies.google.com/technologies/partner-sites?hl=en-GB&gl=uk>

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

For general information on cookies: <https://www.allaboutcookies.org/>

### 3. WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we may process might include your name, email address, telephone numbers and information regarding what pages are accessed and when. If we collect your personal data, it has either been provided to us by you or has been obtained from publicly accessible sources such as LinkedIn, Companies House or other websites.

The general categories of personal data that we process include employee data, client data, marketing data and supplier/partner data.

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Employee data refers to the personal data of individuals employed by Middlemarch.

Client data refers to the personal data of individuals employed by organisations that are clients of Middlemarch and receive their goods and services.

Marketing data refers to the personal data of individuals employed by organisations that Middlemarch wishes to market its products and services to.

Supplier/Partner data refers to the personal data of individuals employed by organisations that Middlemarch receives goods and services from and have business relationships with.

### 4. HOW IS YOUR INFORMATION USED?

We may use your information to:

- Provide you with our products and services.
- To carry out our obligations arising from any contracts entered into by you and us.
- Seek your views or comments on the services we provide.
- Notify you of changes to our services.
- Send you marketing communications that may be of interest to you. These may include information about products and services, events, Middlemarch's general activities.
- Process a job application.

We review our retention periods for personal information on a regular basis. We will process your personal data for as long as necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### 5. WHY IS YOUR INFORMATION USED?

We process your data to be able to carry out our business activities and to benefit you with information, products and services.

If you are employed by a client of Middlemarch, your personal data is deemed client data and is processed on the legal basis of fulfilling a contractual obligation with your employer to provide you with a service.

If you are employed by a supplier or partner of Middlemarch, your personal data is deemed supplier/partner data and is processed on the legal basis of legitimate interest.

If you are employed by an organisation that Middlemarch markets its products and services to your personal data is deemed to be marketing data. Marketing data will include individuals employed by clients and non-clients of Middlemarch. Middlemarch processes this data on the legal basis of legitimate interest.

### 6. WHO HAS ACCESS TO YOUR INFORMATION?

We will not sell or rent your information to third parties.

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents, sub-contractors and other associated organisations for

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the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

### 7. YOUR CHOICES

You have a choice about whether you wish to receive information from us. If you do not want to receive direct marketing communications from us, you can always opt out. To unsubscribe from marketing emails just click the 'unsubscribe' button at the bottom of the email.

### 8. HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION

The accuracy of your information is important to us. If any of your personal data changes or becomes out of date, then please contact us by emailing enquiries@middlemarch-environmental.com. You can also write to us at the address of Middlemarch Environmental Ltd, Triumph House, Birmingham Road, Coventry CV5 9AZ. Alternatively, you can contact us via telephone by calling (+44) 1676 525880.

You have the right to ask for a copy of the information Middlemarch holds about you. You also have the right to request for the information to be removed. You have the right to submit a complaint with a supervisory authority regarding how we process your data.

### 9. SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION

When you give us personal information, we take steps to ensure that it is treated securely. There is an SSL certificate applied to our website. When you are on a secure page, a lock icon will appear next to the URL of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

### 10. PROFILING

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively.

Any profiling made by Middlemarch will be restricted to relevant personal data. We may examine your employer, industry and job title in addition to the personal data we hold to profile you for marketing purposes. We may also profile you based on interactions you have had with Middlemarch. We do this to ensure we provide you with relevant and informative content.

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### 11. LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Tom Docker

**Managing Director**

Approved by the Board on 3<sup>rd</sup> September 2020

Next review date: September 2022