



## Privacy Policy

### Introduction

The overall aim of our Privacy Policy is to ensure that our customers and sales prospects, suppliers, staff and agency workers, and members of the public can have confidence that Test Valley Ltd respects their right to privacy. Supporting this aim, the company has undertaken a full review of its Privacy provisions to coincide with the GDPR deadline of 25th May 2018. It is the responsibility of all employees to identify and report incidents of Privacy Policy non-conformance, and ideas for improvement.

## Policy

### We at Test Valley Ltd

- Publish a detailed Privacy Notice\* that explains the types of personal data that we collect and process, the business processes that this personal data is used for, and providing individuals with information regarding their rights under GDPR.
- Comply with all applicable Privacy legislation and regulations, including GDPR
- Ensure all staff receive role-appropriate Privacy training
- Ensure our Privacy Policy is available to interested parties

\*see below

**May 2018**



## Privacy Policy Notice

### Introduction

This Privacy Policy Notice supports the company's Privacy Policy and contains information that advises individuals about what they can expect when Test Valley Ltd collects their personal data.

### Notice

This notice applies to people who are our:

- Website visitors
- Customer contacts
- Sales leads and prospect contacts
- Supplier contacts
- Job applicants, and current and former employees
- Agency / freelance workers
- Visitors to our premises

Test Valley Ltd is the Data Controller and a Data Processor for the personal data that it obtains, processes and stores. Personal data is shared with a small number of specialist third parties who act Data Processors on behalf of Test Valley Ltd, for example Google Analytics who undertake anonymised website monitoring on our behalf.

Examples of third party Data Processors are: Google Analytics who undertake anonymised website monitoring, our accountants for payroll processing, and our employment advisers who support us with human resource queries.

### WEBSITE VISITORS

### WEBSITE ANALYTICS

When someone visits our websites we use third party services, Google Analytics, HubSpot and HotJar, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow these third parties to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.



Related information including tracking opt out information:

Google's Privacy Policy including tracking opt out information  
<https://policies.google.com/privacy?hl=en>

HubSpot Privacy Policy including tracking opt out information  
<https://legal.hubspot.com/privacy-policy>

HotJar's Privacy Policy including tracking opt out information  
<https://www.hotjar.com/legal/policies/privacy>

## WEBSITE COOKIES

Our websites use cookies. These are small text files that are placed on your computer, with your permission, in order to let websites operate in the intended manner. Cookies can be considered as:

1. **Strictly necessary cookies:** These do not require consent and are vital to make the website work properly.
2. **Performance cookies:** These cookies generally help the website operator fix bugs or glitches on the website. They may also provide analytics on which web pages are popular, allowing the website operator to improve the quality of the user's experience.
3. **Functionality cookies:** These may include settings like "remember me" buttons, language settings, text size and anything that remembers the particular settings chosen by the user. These cookies can be persistent or session cookies, which generally have a longer lifespan than other cookies.

## HOW TO CONTROL COOKIES

When you first visit any of our websites we ask for your consent to use cookies. You can choose not to accept cookies but please be aware that services you request may not be available. If you delete your cookies or clear your cache, you may be asked to give your consent again. This is because a cookie is usually used to remember the choice you made the first time. If you wish to revoke your consent to the use of cookies on this website you can either delete the cookies in your browser's memory or clear your cache.

If you wish to prevent cookies being set before you visit this website, or most other websites, you can set your browser to block cookies. Most browsers allow you to do this in their settings. If you would like to know more about cookies, please visit the ICO website.

## SITE LINKS

If you follow links to other sites from our website your data will be subject to the privacy policies of those sites. You should refer to these policies before providing your data.

## WEBSITE SEARCH

When you use our website search facility, your search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either us or any third party.



## WEBSITE FORMS

When you enter your contact details into a website form, for instance to contact us, or to request information, we will retain your details for the purpose of fulfilling your request. Depending on the outcome of our initial communication(s), we may subsequently contact you with further information regarding our products or services. This contact may be by e-mail, phone or post. If you would prefer us not to keep in touch in this way, you can let us know when you submit your website form, or alternatively, you can advise us at a later date and we will update your records accordingly.

## CUSTOMER CONTACTS

We collect contact details such as name, e-mail address, telephone number(s) and sometimes job role, for our customer contacts. This helps us to know who to contact if we have queries with an order that you have placed, or if we have a more general account query. We may also use your contact details to help us service your account, for example to advise you about price adjustments, or changes to our terms and conditions, or changes to our products and services. These contacts may include amendments to product and service specifications. Additionally, we may contact you if a product or service is discontinued. Very occasionally we may contact you about new products and services – but only if we are confident that these will be relevant to you based on our understanding of your business. This contact may be by e-mail, phone or post. If you have any concerns about being contacted, please get in touch and we will work with you to address this.

## SALES LEADS AND PROSPECT CONTACTS

We collect contact details such as name, e-mail address, telephone number(s) and sometimes job role, for our sales leads and prospect contacts. We use these contact details for marketing purposes, for example to telephone you, or send you an e-mail regarding products and services that we think may be of interest to you. Occasionally we record telephone calls for internal training purposes. If you would prefer not to be contacted for marketing purposes let us know and we will update your records accordingly.

## SUPPLIER CONTACTS

We collect contact details such as name, e-mail address, telephone number(s) and sometimes job role, for our supplier contacts. This helps us to know who to contact if we have queries with an order, or if we need to get in touch with you regarding our account.



## JOB APPLICANTS, AND CURRENT AND FORMER EMPLOYEES

### JOB APPLICANTS

Information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for, and in some instances to monitor the rigour of our recruitment process.

We might ask you to attend an interview, and may ask you to participate in tests or other assessment activities.

If your application is unsuccessful or you chose to withdraw from the process, your application, the outcome of your interview, plus any tests or assessments will be retained by Test Valley Ltd for a period not exceeding six months. We may also ask if you would like your details to be retained for a period of six months. If you say yes, we will contact you should any further suitable vacancies arise.

### OFFER OF EMPLOYMENT

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies
- You will be asked to complete a criminal records declaration to declare any unspent convictions
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work

### IF WE MAKE A FINAL OFFER, WE WILL ALSO ASK YOU THE FOLLOWING:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work



## EMPLOYMENT AND END OF EMPLOYMENT

If you are successful, all of the information you provide during the application process, plus information pertaining to the period of your employment (e.g. salary records), will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.

## AGENCY / FREELANCE WORKERS

We hold contact details such as name, e-mail address and telephone number(s) for our agency and freelance workers. This helps us to contact you if we have queries regarding your availability, or the work that you carry out for us.

## VISITORS TO OUR PREMISES

We hold contact details such as name, company, job role and car registration number for visitors to our offices. These details are recorded in our visitor book for the purposes of site security. Additionally, We do not use visitor contact details for marketing purposes. Additionally, for further security, some areas of our premises, including our vehicle yard and yard entrance, are monitored by CCTV. These areas are clearly identified by signage.

## GENERAL

### DATA STORAGE

All personal data collected by us will be held securely by us and/or our data processors whether the information is in electronic or physical format.

### YOUR RIGHTS

From the 25th May 2018 the Data Protection Act 1998 will be superseded by GDPR (General Data Protection Regulations).

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

As of 25th May 2018, these rights will be superseded by GDPR (General Data Protection Regulations). You can read about these regulations here – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

### COMPLAINTS OR QUERIES

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.



If you want to make a complaint about the way we have processed your personal information, please contact us in the first instance and we will do our utmost to resolve the situation. If you are unhappy with the efforts that we have made, or have ongoing concerns that you do not think we are able to resolve, you can contact the statutory body that oversees data protection law – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## ACCESS TO PERSONAL INFORMATION

We try to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under GDPR. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form

To make a request for any personal information we may hold you need to put the request in writing addressing it to our Managing Director at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting our Managing Director.

## LEGAL DISCLOSURE OF PERSONAL INFORMATION

There may be circumstances where we need to pass your personal data to a third parties for processing. In any such instances we will ensure that there:

- is a legitimate, legal basis for sharing the data, and we have a legal agreement in place with the organisation with which the data has been shared, or
- there is an overriding legal requirement for us to share personal data, for example to prevent and detect crime

We will never sell or share your personal data with third parties for their marketing purposes.

## MARKETING

To help grow our business we undertake marketing activities such as tele-marketing, e-marketing and occasionally postal marketing. We take steps to try to ensure that all of our marketing is applicable to the person receiving it, and is tailored to their needs. So, if you receive marketing from us it is because we think that our products and / or services will be relevant to you. However, if you would like to opt out of future marketing please let us know: either phone us on 01722 414800, e-mail [enquiry@testvalleypkg.co.uk](mailto:enquiry@testvalleypkg.co.uk), or write to Managing Director, Test Valley Ltd, Watt Road, Salisbury, SP2 7UD.

## CHANGES TO THIS PRIVACY NOTICE

We keep our privacy notice under regular review. This privacy notice was last updated February 2018.

## HOW TO CONTACT US

If you want to contact us regarding our Privacy Policy or Privacy Notice, you can e-mail [enquiry@testvalleypkg.co.uk](mailto:enquiry@testvalleypkg.co.uk), or write to Managing Director, Test Valley Ltd, Watt Road, Salisbury, SP2 7UD