



Project Name

**Policies & Procedures**

Document Title

**Privacy Policy**

Client:

Martin Arnold Limited  
4 Gunnery Terrace  
The Royal Arsenal  
London  
SE18 6SW

Date:

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Job No:

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## Privacy Policy

Applies to:	All Staff
Policy Implementation Date:	August 2014
Policy Custodian:	Roger Arnold & Jim Martin
Policy Authorisation	Chris Martin
Responsible Person	Chris Martin
Next Review Date	1 <sup>st</sup> February 2024

Revision No.	Date Issued	Description of Revision: Page No.	Description of Revision: Comment	Author/Contributor
1.0	2014	List 1 or multiple		XX
2.0	05/2018	More thorough release for GDPR introduction		CM/TI
2.1	11/11/21	Check policy is current.	Update Website Cookies address	TI

### Access Control

Format	Public Access	Internal Access	Confidential
Editable	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PDF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PDF/(Protected)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## 1. Scope

All data subjects whose data is collected by Martin Arnold Ltd.

## 2. Responsibilities

- 2.1. The company is responsible for ensuring that this notice is made available to data subjects prior to or at the time of Martin Arnold Ltd collecting/processing their personal data.
- 2.2. All Employees of Martin Arnold Ltd who interact with data subjects are responsible for ensuring that this notice is made available to the data subject and their consent to the processing of their data is secured.

## 3. Privacy Notice

### 3.1. Who are we?

Martin Arnold Ltd is the organisation who collects the personal data from [martinarnold.co.uk](http://martinarnold.co.uk) and in turn makes it a data controller. Martin Arnold Ltd may use your data to help find the relevant services for yourself which in turn makes us also a data processor.

### 3.2. Why we collect the data and what we do with it?

We may use your data to find out your requirements and if you are interested in items or services. If you express an interest in our online offerings we may use your details to make further contact.

Our dedicated point of contact for Data queries can be contacted here:

- C. Martin
- 020 8317 7557

## 4. The Data we may collect /process is:

### 4.1. Data Types

#### 4.1.1. Contact Name :

We will use this to service your enquiry and to ensure we are speaking to the correct person when we make contact.

#### 4.1.2. Contact Number:

We may use this to service your enquiry, we may call you in order to discuss your enquiry.

#### 4.1.3. Contact Email:

We may use this to service your enquiry, we may email details of the product or service or clarify your query.

#### 4.1.4. Time Stamp & Date Stamp of Enquiry:

We will use this to service your order and for compliance to ensure we can provide proof of enquiry made and to assist with matching our SLA's.

#### 4.1.5. IP Address:

We may use this for compliance to ensure we can provide proof of enquiry made.

#### 4.1.6. If you'd like to be contacted in the future:

We may use the information to contact you in the future; this can be changed by yourself at any time.

4.1.7. How you'd like to be contacted in the future:

We will only contact you by the methods you choose; this can be changed by yourself at any time.

4.2. The personal data we collect may be used for the following purposes:

- We use your data to help us service your enquiry
- We use your data to help us manage any service you take out with us
- To assist in improving our products, services, and offerings
- If you opted in for marketing in the future regarding new products, services or events we offer we will only contact you on your preferred method from Martin Arnold Ltd.

4.3. Our legal basis for processing the personal data:

- If you decided to enter into a business agreement with Martin Arnold Ltd., under the contract we will need to process your details to service mutual interests
- We may contact you if we believe matters of a serious or legal nature arise that require your attention

4.4. The special categories of personal data concerned are:

We do not process any special categories. We have included a list of what these categories are for your records under GDPR.

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Sexual orientation

## 5. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Martin Arnold Ltd to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time by contacting our designated contact above or using the opt-out facility on any marketing material received from Martin Arnold Ltd.

## 6. Disclosure

Martin Arnold Ltd will not pass on your personal data to third parties without prior consent or legitimate business reasons, see item 10.3.

## 7. Retention Period

Martin Arnold Limited's retention period is set out within our Data Retention & Disposal Policy.

## 8. Your rights as a data subject

At any point while we are in possession of your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Martin Arnold Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 8.1 below.

### 8.1. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Martin Arnold Ltd, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Martin Arnold Ltd's data protection representative – C. Martin.

The details for each of these contacts are:

#### **Data Protection Representative**

C. Martin  
020 8317 7557

#### **Information Commission Officer (ICO)**

Wycliffe House, Water Ln, Wilmslow, SK9 5AF  
<https://ico.org.uk>  
[casework@ico.org.uk](mailto:casework@ico.org.uk)  
0303 123 1113

## 9. Privacy Statement

Read more about how and why we use your data here

### 9.1. Online Privacy Statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

*“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.*

## Martin Arnold Ltd's - How we use your information

The below privacy notice(s) tells you how we, Martin Arnold Ltd, may collect and use your personal data.

### 9.2. Visitors to our website(s) and Cookies

When visitors arrive on martinarnold.co.uk or any sub-site we may use a third-party service, called google analytics, to collect from you basic internet log information and information on your behaviour patterns whilst on the site(s). This information lets us know how many visitors come to the site(s), what pages they are looking at and the amount of time spent on each page. The information collected cannot identify an individual.

Martin Arnold Ltd also collect first-party cookies, which are essential for the site(s) to operate correctly.

If personally identifiable information is collected through our website, we will be up front, transparent and put in place appropriate notices and prompts. We will make it clear when and what information shall be submitted and explain it's intended processing use.

You can learn more about our cookie policy [here](#).

### 9.3. E-newsletter

We may send out a newsletter to people who have explicitly expressed they want to be contacted with a newsletter and selected emails

### 9.4. Security and Performance

We use a third-party programme to protect our website from malicious malware and attacks which means it will check your IP address on arrival.

### 9.5. People who contact us via social media

We may contact you back on the platform you contacted us.

### 9.6. Inbound Calls to Our Office

We may collect your calling line identification (CLI), name, and purpose of the call. This will only be collected in order to assist with your enquiry.

## 10. Uses Made of the Information

### 10.1. We use the information held about you in the following ways:

#### 10.1.1. Information you give to us:

We use this information to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services you request from us, to notify you about changes to or to make suggestions and recommendations that may interest you about our range of services, or to ensure that content from our site is presented in the most effective manner for you and for your computer.

#### 10.1.2. Information we collect about you:

We may use this information to administer/improve our site(s) and for internal operations including troubleshooting, data analysis, testing, research, and statistical purposes; to ensure

that content is presented in the most effective manner for you and for your computer; to allow you to participate in interactive features of our services, when you choose to do so; as part of our efforts to keep our site safe and secure;

10.2. Why does Martin Arnold Ltd need to collect and store personal data?

In order for us to provide you with a service, the services we provide are as follows.

Building & Quantity Surveying  
Construction Consultancy  
Architecture & BIM Engineering  
Online Collaboration Services

We need to collect personal data for correspondence purposes and servicing enquiries and to ensure we can provide any services that our clients have requested. We are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

If contact is made for marketing purposes Martin Arnold Ltd will always request additional consent.

10.3. Will Martin Arnold Ltd share my personal data?

We may on occasion pass your personal details on to a Third-Party; this is done in circumstances where we have **a)** a legally binding requirement **b)** we require use of the third-party service to fulfil a contractual obligation to you **c)** the third-party offers a niche service that assists with the protection, security, integrity of your data and your preferences for contact. All third-parties adhere to the same or high levels of Data Protection as Martin Arnold Ltd. We ensure that appropriate safeguards are in place before any data transfer is made.

10.4. How will Martin Arnold Ltd use my personal data?

(See item 4.2)

10.5. Under what circumstances will Martin Arnold Ltd contact me?

Our aim is not to be intrusive, we will only contact you in relation to the reasons set out in item 4.2 & 4.3.

10.6. Can I find out the personal data that Martin Arnold Ltd holds about me?

Martin Arnold Ltd at your request, will endeavour to confirm what personal information we hold about you and why. If Martin Arnold Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer at the responsible organisation, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Martin Arnold Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.

- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely will be made available. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing where relevant.

10.7. What forms of ID will I need to provide to access this?

Martin Arnold Ltd accepts the following forms of ID when information on your personal data is requested:

**Passport or photo driving licence & proof of address (utility bill – dated within the last 3 months)**

If you can't provide a passport or driving licence we will accept a birth certificate with some form of valid photo ID & proof of address in the last 3 months.

**Contact details of the Data Protection Representative / GDPR Owner:**

- C. Martin
- \_dataqueries@martinarnold.co.uk
- 020 8317 7557
- Martin Arnold Ltd, 4 Gunnery Terrace, The Royal Arsenal, London SE18 6SW
- martinarnold.co.uk