

# Privacy Notice

## Revision History

Version	Revision Date	Revised by	Section Revised
RA	15.01.2019	Suzanne Le Grand	Original Issue
RB	26.11.2019	Suzanne Le Grand	Contents page and accreditation kitemarks added
RB	16.01.2020	Suzanne Le Grand	No Changes
RB	18.01.2021	Suzanne Le Grand	No Changes
RB	04.10.2021	Suzanne Le Grand	No Changes
RB	27.04.2022	Suzanne Le Grand	No Changes
RB	06.05.2023	Suzanne Le Grand	No Changes

## Document Control

<b>Document Owner:</b> Gel Engineering	<b>Document No:</b> GEL-QMS-POL-014	<b>Status:</b> Approved	<b>Date Approved:</b> 15.01.19
<b>Document Approver:</b> Oisín Gibson	<b>Next Review Date:</b> 06.05.2024	<b>Version:</b> RB	<b>Department:</b> HR



FS710925 EMS710923 OHS710924

# Privacy Notice

## Contents

Who We Are? .....	3
Definitions and interpretation .....	3
Types of data we collect and why .....	4
How We Use Your Personal Data ( <i>Legal Basis for Processing</i> ) .....	4
Automatic, statistical data.....	4
Third Party Services .....	5
Your Rights .....	5
Cookies.....	6
Sharing and Disclosing Your Personal Information .....	6
Safeguarding Measures .....	7
Transfers Outside the EU.....	7
Consequences of Not Providing Your Data .....	7
Legitimate Interests .....	7
Data Retention .....	7
Changes to this policy .....	8
Questions or concerns about our collection .....	8



## Who We Are?

Gel Engineering ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Gel Engineering registered office is at The Wenta Business Centre, 1 Electric Ave, Enfield, EN3 7XU and we are a company registered in England and Wales under company number 08032283. We are registered on the Information Commissioner's Office Register and act as the data controller when processing your data. Our designated Responsible Persons can be contacted at The Wenta Business Centre, 1 Electric Ave, Enfield, EN3 7XU.

## Definitions and interpretation

In this Policy, the following terms shall have the following meanings:

- **"Account"** means collectively the personal information, payment information and credentials used by Users to access Material and/or any communications system on the website;
- **"Content"** means any text, graphics, images, audio, video, software, data compilations and any other form of information capable of being stored in a computer that appears on the website;
- **"Cookie"** means a small text file placed on your computer by Gel Engineering Limited when you visit certain parts of this Web Site. This allows us to identify recurring visitors and to analyse their browsing habits within the Web Site. Further details are contained in Clause 5;
- **"Data"** means collectively all information that you submit to Gel Engineering. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;
- **"Personal Data"** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour;
- **"Gel Engineering", "we", "us", "our"** means Gel Engineering Limited of The Wenta Business Centre, 1 Electric Ave, Enfield, EN3 7XU
- **"Service"** means collectively any online facilities, tools, services or information that Gel Engineering Limited makes available through the Web Site either now or in the future;
- **"Products"** means products and services supplied by Gel Engineering
- **"System"** means any online communications infrastructure that Gel Engineering Limited makes available through the Web Site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links;
- **"User" / "Users"** means any third party that accesses the Web Site and is not employed by Gel Engineering and acting in the course of their employment; and
- **"Web site"** means the following domains [www.gelengineering.co.uk](http://www.gelengineering.co.uk)



## Types of data we collect and why

**Personal Information.** This includes any information that may be used to identify you. Generally, you can browse the website without giving us any personal information. However, when opening up for an account or completing an enquiry / contact us, any of the following data may be collected:

- a. Name
- b. Date of Birth
- c. Gender
- d. Job title
- e. Profession
- f. Contact information such as email address and telephone number/s
- g. Demographic information such as postcode, preferences and interests
- h. Identification documents such as photo ID and proof of address
- i. Financial information such as credit/debit card numbers and bank details

## How We Use Your Personal Data (*Legal Basis for Processing*)

Gel Engineering takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- We collect your personal/business data in the performance of a contract, or to provide a service, or to collect payment, and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We have a legal obligation to share your personal data with a credit reference agency and provide us with financial background checks prior to you commencing trading with Gel Engineering
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests
- To determine effectiveness of marketing and sales.
- To understand how people, interact with our website and our business.
- To collate customer satisfaction feedback to aid business continual improvement.
- To prevent fraud
- Management of customer / business relationships.

## Automatic, statistical data.

We use third party services, including external IT support and Google Analytics, to collect standard internet log information that help us analyse traffic to the website and understand visitor behaviour and needs to make continuous improvements to the site and your user experience. This information includes:

- a. IP address
- b. Web browser type and version



- c. Operating system
- d. A list of URLs starting with a referring site, your activity on this website, and the site you exit to
- e. Cookie information (see below)

We only collect anonymous statistics, which are processed in a way that does not allow for anyone to be identified. You can find out more about our Cookie Policy below.

Any personal data you submit will be retained by Gel Engineering Limited for as long as you use our services or systems provided on the website. Data and information that you submit through any communications system that we may provide may be retained for a longer period.

Unless we are obliged or permitted by law to do so, and subject to third party services, your data will not be disclosed to third parties. This does not include our affiliates and/or other companies within our group where you have specifically asked for contact to be made. We do not rent, trade or sell email lists with other organisations and businesses.

### Third Party Services

Gel Engineering Limited may, from time to time, employ the services of other parties to deal with matters including, but not limited to:

- a. Accountancy
- b. IT/Website Support
- c. Delivery of works materials
- d. Search engine facilities
- e. Advertising and marketing
- f. Contractors

The providers of such services do not have access to certain personal data provided by our customers and users of the website. The providers only have access to data that is necessary and relevant.

### Your Rights

You have the right to access any personal information that Gel Engineering processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information, we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.



You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## Cookies

Gel Engineering Limited may use 'Cookies' to receive and store certain details whenever a user interacts with us.

A 'Cookie' is a small text file that is stored by the browser on your computer, tablet or mobile phone. Websites are able to read and write these files, allowing them store things such as personalisation details or user preferences. By providing this "memory" for the website, they enable it to recognise a user. Each web domain can only access Cookies stored by that specific web domain, meaning that only the Gel Engineering servers can access the Cookies set by the Gel Engineering domains.

When visiting a page on the website the following cookies may be created or updated:

- **Authentication cookies:** A cookie is generated to indicate if you are logged in to this site. We use this cookie to determine which account you are logged in to and if you have authorisation to access specific pages (e.g. your company's administration page).
- **Anonymous analytics cookies:** Our web analytics software uses this cookie to compile anonymous usage statistics (e.g. number of visitors, which pages are visited most etc.). We use this information to measure how well the website is doing and to look for ways to improve your experience.
- **Third party social cookies:** A cookie may be generated on some pages of the website, when a user interacts with the embedded social sharing buttons (e.g. Likes, Tweets or 1s a post). These cookies are created by the third party social sites and are used to record the action you've taken, such as Liking a page.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept cookies, but this can be altered. For further details on how to do this, please consult the help menu in your browser. Please note, disabling or deleting Cookies may prevent you full usage of the website.

## Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Gel Engineering uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

- Audits & Governing Bodies
- IT



FS710925

EMS710923

OHS710924

- IT Support / IT Maintenance / Website
- Finance
  - Records business accounting, debt and transactional history and tax purposes
- Insurance company
  - Hold personal data to provide insurance cover for company / commercial insurance

The privacy notices for the third-party providers can be requested from [info@gelengineering.co.uk](mailto:info@gelengineering.co.uk)

## Safeguarding Measures

Gel Engineering takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including:** -

- Restricted access
- IT authentication
- Firewalls
- Anti-virus/malware

## Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Gel Engineering does not transfer or store any personal data outside the EU.

## Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Gel Engineering, however, as this information is required for us to provide you with our services/deliver your products/legitimate interests, we will not be able to offer some/all our services without it.

## Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing quotes / invoices/payments/management of customers and suppliers and have identified that our interests are to maintain customer and supplier relationships.

## Data Retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements.

Retention periods vary depending on the type of Personal Data. However, we are legally required to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers, for tax purposes.





# Privacy Notice



Imagine ♦ Innovate ♦ Implement

## Changes to this policy

We may update this Privacy Policy from time to time, without notice, as we deem necessary to keep it relevant or where we may be required to update it by law. The most up to date Privacy Policy will be immediately posted on the website.

## Questions or concerns about our collection

Gel Engineering only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Gel Engineering

The Wenta Business Centre, 1 Electric Ave, Enfield, EN3 7XU

Call: 0203 282 1402 email: [info@gelengineering.co.uk](mailto:info@gelengineering.co.uk)

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.0303 123 1113 or <https://ico.org.uk/global/contact-us/helpline/>

