



FDL PRIVACY POLICY

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1. INTRODUCTION

- The Board of Directors and management of FDL, located at FDL, Metropolitan Wharf, London, E1W3SS are committed to compliance with all relevant EU and Member State laws in respect of personal data, and the protection of the “rights and freedoms” of individuals whose information FDL collects and processes in accordance with the General Data Protection Regulation (GDPR).

2. TERMINOLOGY

Below is some quick guidance on terminology to help you clearly understand this Policy

- Personal data is any information relating to an identified or identifiable living person.
- The Data Controller is a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. In the context of this Policy, FDL is the Data Controller.

Other terms are defined in the Glossary at the end of the document.

3. SECURITY

FDL is committed to protecting your personal data and privacy.

We have security measures in place designed to prevent the loss of data, preserve data integrity, and to control access to the data and know that ensuring the accuracy and security of personal data is essential to retaining confidence and trust.

4. PURPOSE OF THIS PRIVACY POLICY

The purpose of this privacy policy is to describe, in cases where FDL is the Data Controller, why and how we collect and use your personal data and provides information about your rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy policy or as otherwise stated at the point of collection.

When collecting and using personal data, our policy is to be fair, lawful and transparent about why and how we process personal data.

To find out more about our specific processing activities, please go to the relevant sections of this policy.

Topics:

[What we do with your Personal Data](#)

- [If you are an FDL Customer or Prospective Customer](#)
- [If you are Visitor to our Website](#)
- [If you are contact us directly via telephone or email to make an enquiry with regards to our services](#)
- [If you are an FDL Supplier](#)
- [If you are an FDL Recruitment Applicant](#)



- [If you are a Visitor to FDL](#)

[How to contact us](#)

[Your Rights](#)

[Changes to our Privacy Policy](#)



5. WHAT DO WE DO WITH YOUR PERSONAL DATA

Please go to the sections of this policy that are relevant to you, to find out more about what we do with your personal data: -

5.1 If you are a FDL Customer or Potential Customer

5.1.1 Why we use your personal data

We use your data for the following purposes: -

- To identify if you have registered with the Corporate Telephone Preference Service, Telephone Preference Service and/or have notified FDL that you do not wish to be contacted and/or receive direct marketing information regarding our products, services and activities;
- Unless we have identified you do not wish to receive marketing information, as per above – to contact you directly in the future regarding our products, services, and/or events (i.e. via telephone, postal and electronic marketing);
- To send you communication regarding FDL's activities.

5.1.2 How we obtain your personal information and the types of personal information we may obtain

Your personal information is directly given by you.

We process the following types of personal information in relation to you - e.g. (this is not an exhaustive list): -

- Title
- Name
- Job Title
- Contact Details (Work address, Work Email address, work telephone number).

5.1.3 Our legal basis for using your personal data

The processing of your personal data is based upon the lawful basis of Legitimate Interests – as we feel that as an existing customer you may find value in knowing about similar products and services we provide.

5.1.4 Who we share your data with

We may share your information with: -

Technology and telecoms Providers who we engage to support our operations and/or host our data.

5.1.5 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.



5.1.6 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence is seven years.

5.1.7 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.

5.1.8 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).



5.2 If you visit our Website

5.2.1 Why we use your personal data

We use your data for the following purposes: -

If you visit our website your personal data will not be collected or analysed.

If you submit a job application via our website – please refer to Section 5.6

5.2.2 Cookie Policy

Currently we do not use cookies on our website. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

5.2.3 Social Media

FDL also uses interfaces with social media sites such as Facebook, LinkedIn, and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other Personal Information.



5.3 If you are someone who provides us with your contact details at an Exhibitions/Conferences (e.g. business card)

5.3.1 Why we use your personal data

When you provide your business contact details at an event your personal data is used to:

- Identify if you have registered with the Corporate Telephone Preference Service, Telephone Preference Service and/or have notified FDL that you do not wish to be contacted and/or receive direct marketing information regarding our products, services and activities;
- Unless we have identified you do not wish to receive sales/marketing information, as per above – to contact you directly in the future regarding our products and services (i.e. via telephone, postal and electronic marketing);
- To send you communications regarding FDL's activities.

5.3.2 Our legal basis for using your personal data

The processing of your personal information is based upon the lawful basis of: -

- Legitimate Interests – as you have expressed an interest in our services and activities and for the purpose of contacting you in relation to future events and/or sending communications;
- Legal Obligation - For cases where you may have objected to marketing, we also have a legal obligation to hold some personal data, albeit limited, in order to ensure no more marketing is sent to you.

5.3.3 Who we share your data with

We may share your information with technology Providers who we engage to support our operations and/or host our data.

5.3.4 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.

5.3.5 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence seven years.



5.3.6 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.

5.3.7 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g. we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).



5.4 If you contact us directly via telephone or email to make an enquiry with regards to our services

5.4.1 Why we use your personal data

We use your data for the following purposes: -

- To progress an opportunity;
- Identify if you have registered with the Corporate Telephone Preference Service, Telephone Preference Service and/or have notified FDL that you do not wish to be contacted and/or receive direct marketing information regarding our products, services and activities;
- Unless we have identified you do not wish to receive marketing information, as per above – to contact you directly in the future regarding our products, services, and/or events (i.e. via telephone, postal and electronic marketing);
- To send you communication regarding FDL's activities.

5.4.2 Our legal basis for using your personal data

The processing of your personal information is based upon the lawful basis of: -

- Legitimate Interest – as you have expressed an interest in our services and activities and for contacting you in relation to future events and/or sending communications;
- Legal Obligation - For cases where you may have objected to marketing, we also have a legal obligation to hold some personal data, albeit limited, in order to ensure no more marketing is sent to you.

5.4.3 Who we share your data with

We may share your information with: -

Technology Providers who we engage to support our operations and/or host our data.

5.4.4 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.

5.4.5 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence is seven years.

5.4.6 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.



5.4.7 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g. we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).

5.5 If you are a FDL Supplier

5.5.1 Why we use your personal data

We use your data for the following purposes: -

- To maintain a relationship with you in relation to our orders and your services (e.g. in relation to service delivery activities, invoicing and ongoing communication/relationship management);
- To send you communications regarding FDL's activities.

5.5.2 Our legal basis for using your personal data

The processing of your personal information is based upon the lawful basis of: -

- Business to Business contacts: Legitimate Interests – to maintain a relationship with you in relation to our orders and your services (e.g. in relation to service delivery activities, invoicing and ongoing communication/relationship management);
- Business to Business contacts: Legitimate Interests - For the purpose of contacting you in relation to future events and/or sending communications;
- Business to Business contacts & Business to Consumer contacts: Consent – for inclusion in any press articles and/or case studies, in which case we will always obtain your fully informed, freely given, consent (i.e. we will obtain your permission);

5.5.3 Who we share your data with

We may share your information with: -

Technology Providers who we engage to support our operations and/or host our data.

5.5.4 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.

5.5.5 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence is seven years after end of the commercial relationship.



5.5.6 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.

5.5.7 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).



5.6 If you are a FDL Recruitment Applicant

5.6.1 Why we use your personal data

We use your data for the following purposes: -

- Consider you for a recruitment vacancy;

5.6.2 Our legal basis for using your personal data

The processing of your personal information is based upon the lawful basis of: -

- Legitimate Interest – as you have expressed an interest in working with us and we will be able to consider your application and contact you in this respect.

5.6.3 Who we share your data with

We may share your information with: -

Technology Providers who we engage to support our operations and/or host our data.

5.6.4 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.

5.6.5 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence is seven years after the end of employment (if successful) or 6 months if unsuccessful.

5.6.6 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.

5.6.7 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).



5.7 If you a Visitor to FDL

5.7.1 Why we use your personal data

We use your data for the following purposes: -

- For security and health and safety purposes (knowing who is in our building and when).

5.7.2 Our legal basis for using your personal data

The processing of your personal data is based upon the lawful basis of Legitimate Interests – as it is important to ensure the safety of yourself and others and also to ensure the security of our information.

5.7.3 Who we share your data with

We may share your information with: -

Technology Providers who we engage to support our operations. FDL host our own CCTV images.

5.7.4 The transfer of your personal data to a Country or International Organisation outside of the European Union

We do not intend to transfer your personal data to any countries or International Organisations outside of the European Union.

5.7.5 How long we keep hold of your data

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for your personal data and other documentary evidence is 7 years after your last visit with us.

5.7.6 Statutory or Contractual Requirement

The provision of your personal data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract, nor are you obliged to provide the personal data.

5.7.7 Automated Decision Making & Profiling

We do not make any decisions in relation to your personal data, solely by automated means without any human involvement (e.g we do not conduct automated decision making).

Neither do we conduct any automated processing of personal data to evaluate certain things about you (e.g. we do not conduct profiling).



6. FDL'S CONTACT DETAILS

The Data Controller is FDL Limited (Details as above).

FDL's Company Data Protection Lead is the Operations Manager.

If you have any questions about this Privacy Policy or how and why we process personal data, please contact us via any of the routes below: -

Post:

FDL,

Metropolitan Wharf,

London,

E1W 3SS

Email: itd@fdl.co.uk

Phone: Data Protection Lead 0207 4880777



7. YOUR RIGHTS

Under certain circumstances, you have the rights under data protection laws in relation to your personal data. These rights are summarised below but if you would like more information on these rights, please go to the [ICO's website](#). Additionally, if you wish to exercise any of these rights listed below, please contact us using the details above.

7.1 Access to your personal data

You have a right of access to personal data held by us as a Data Controller. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (1 month under GDPR).

7.2 Correcting your personal data

You have a right to request amendment(s) to your personal data. Wherever practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make the necessary amendments based on the updated information.

7.3 Restriction of Processing of your personal data

In certain circumstances, you have the right to request the restriction or suppression of your personal data. This effectively allows you to limit the way that we use your personal data.

7.4 Object to Processing

In certain circumstances, you have the right to object to the processing of your personal data. This effectively allows you to ask us to stop processing your personal data.

Where we have told you that any use of information is based on 'legitimate interest', you can raise an objection to that use. When you make an objection, we'll have up to one month to respond to you. We will stop using the information in this way unless we disagree that we should because of a compelling legal justification for continuing to use it. We'll always tell you what the justification is.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please use the contact details above.

7.5 Erasure (also known as "the right to be forgotten")

In certain circumstances, you have the right to request the erasure of your personal data.

7.6 Portability

In certain circumstances, you may have the right to obtain and reuse your own personal data, that you provided to us, for your own purposes across different services. This data will be provided in a structured, commonly used and machine-readable format and we can transmit this data directly to other parties at your request.



7.7 Withdrawal of consent

Where we process your personal data based on consent, you have a right to withdraw consent at any time.

If you would like to request to withdraw your consent, please contact us using the contact details above.

7.8 Complaints

In the event you wish to complain about our use of your personal data, please send an email with the details of your complaint to itd@fdl.co.uk. We will look into and respond to any complaints we receive.

You also have a right to lodge a complaint with the Information Commissioner's Office (ICO) (the UK's data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website: www.ico.org.uk.



8. CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and we will place any updates on this web page.

If we believe that the changes are material, we'll let you know by posting the changes on this website.

This privacy policy was last updated on 02/07/19.



9. GLOSSARY OF TERMS

Consent (of the data subject): any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Controller (or Joint Controller): a person who, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Protection Officer (DPO): an individual or legal entity appointed to inform and advise the data controller or the data processor and the employees who carry out the processing of their obligations under the GDPR

Data Subject: An identifiable living person to whom the data relates to.

GDPR: General Data Protection Regulation

Personal data: Any information relating to an identified or identifiable living individual ('data subject').

Processing: means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor: a person which processes personal data on behalf of the controller.

Special categories of data (often referred to as 'Sensitive personal data'): Health data, genetic and biometric data (new under the GDPR), trade-union membership, data concerning health or sexual life, political opinions, religious and philosophical beliefs, criminal offences and racial or ethnic origin related data.