

General Data Protection Regulation (GDPR) – Statement Updated December 2021 – Note this document refers equally to both UK & EU GDPR until such time there is divergence between the two.

Barrett Steel Limited ("We") are committed to protecting and respecting your privacy.

This statement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and used by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR") and further resources available from www.ico.org.uk.

### Who are we?

Barrett Steel Group (this includes its subsidiary companies &/or trading entities) is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are <a href="mailto:GDPR@barrettsteel.com">GDPR@barrettsteel.com</a>

### The purpose(s) of processing your personal data (article 9 GDPR)

We may use your personal data for the following purposes: Consent, Contract, Legal Obligation, Vital Interests, Public Task, Legitimate Interests, Criminal Offence.

### The categories of personal data concerned (article 9 GDPR)

With reference to the special categories of personal data described in GDPR legislation we understand that this data is more sensitive, and so needs greater protection. We therefore only request, process and retain this data IF necessary & only ever with your written consent.

### Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with authorised 3<sup>rd</sup> parties such as Enforcement Agencies, Certification bodies.

### Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: Subject Access Request, Data Correction, Data Erasure, Data Portability, right to be Forgotten.

### Transfer of Data Abroad

Data is housed and maintained on a UK server infrastructure, if your data is transferred outside the EEA we will advise you in writing, stating the terms and our legal justification for doing so.

# **Automated Decision Making (ADM)**

We only use ADM within our Marketing Department opt in consents are provided, please contact <a href="marketing@barrettsteel.com">marketing@barrettsteel.com</a> for further information.

# **Further processing**

If we wish to use your personal data for a new purpose, not covered by this statement, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### Email

Emails sent to business email addresses may be read by other colleagues this allows for the servicing of legitimate business activities, employees will be notified if their email account can be accessed. Emails which are intended for the recipient only, MUST be clearly marked in the subject heading as "Private & Confidential", employees are discouraged from using their business email address for personal matters. Employees who view or share emails marked as "Private & Confidential" without prior written authorisation & consent may face disciplinary investigation & action.

## Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website, www.barrettsteel.com and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact GDPR@barrettsteel.com

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners

Office on 03031231113 or via email https://ico.org.uk/global/contact-us/email/

Yours faithfully

Sharon L Smith

Integrated Management Systems Director







