

## PRIVACY NOTICE

This Privacy Notice sets out when and how we use the personal information (Personal Data) that you or others provide to us or that we collect about you directly or via third parties, as well as the rights you have in relation to that collection and usage.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

If you have any questions regarding our Privacy Notice, please contact us at [admin@alcema.co.uk](mailto:admin@alcema.co.uk)

If there are any points below with which you are not happy, you should leave our website immediately or contact us with your queries or concerns.

Except as set out below, we do not share, sell, or disclose to a third party, any information collected through our website.

### WHO WE ARE

We are **Alcema Limited**, a company registered in England with company number 10063038 and its registered address at The Oakley, Kidderminster Road, Droitwich, Worcestershire, WR9 9AY, England (“we”, “our”, or “us”).

For the purposes of Data Protection Legislation, we are the ‘Data Controller’ in relation to any information that we capture through our website (e.g. through forms that you complete or cookies) and for managing our business. We are registered with the Information Commissioners Office under registration number ZB374452.

### DEFINITIONS

“**Data Protection Legislation**” means the Data Protection Act 2018 (**DPA 2018**); the UK General Data Protection Regulation (Retained Regulation (EU) 2016/679) (**UK GDPR**); the EU General Data Protection Regulation (**GDPR**); the Privacy and Electronic Communication (EC Directive) Regulations 2003 (**PECR**); and any other applicable data protection and privacy laws and regulations or guidance issued by the Information Commissioner’s Office or other relevant regulator or industry body, each as amended or replaced from time to time.

The following definitions (abridged) from Data Protection Legislation are included for your reference:

“**Personal Data**” means any information relating to an identified or identifiable natural person.

“**Data Controller**” means the natural or legal body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“**Processing**” (and process, processes, and processed shall be construed accordingly) means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means.

### HOW WE USE YOUR DATA

#### When you send a job application / if you are employed by us

If you send us Personal Data in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it. Staff members should view the Alcema Internal Privacy Policy for further information.

## **Sending a message to our support team**

When you contact us, whether by telephone, through our website, or by e-mail, we collect the data you have given to us in order to reply with the information you need. This may include your name, email address, postal address, phone number and any supplementary information about yourself.

We record your request and our reply in order to increase the efficiency of our business.

We keep Personal Data associated with your message, such as your name and email address, to be able to track our communications with you to provide a high-quality service, to carry out our contract or potential contract with you (or with your business) or for our legitimate interests to update our records, examine and develop our business operations.

## **When you use our services**

We may use your name, email address, postal address, phone number and job title when you or your business engage our services. We may use this personal data to carry out our commercial relationship and supply our services to you or your business and/or to effectively manage our ongoing relationship. We may be required to notify you about changes to our services, our Terms & Conditions or our Privacy Notice.

## **When you use our website**

We may capture technical information, including your internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version, the full URL clickstream to, through and from our website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page. We may use this information to administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to improve our website and to deliver appropriate and effective content to you on our website.

## **LEGAL BASIS OF PROCESSING**

We will only process your Personal Data for as long as we have a relevant legal basis to do so.

If a basis on which we process your Personal Data is no longer relevant, then we shall immediately stop processing your Personal Data.

If the basis changes then, if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

The legal bases on which we process your Personal Data are:

### **1. Consent**

You provide your consent for us to process information that may be Personal Data through certain actions (when otherwise there is no contractual relationship between us), such as when you browse our website, ask us to provide you more information about our business, including job opportunities and our services.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [admin@alcema.co.uk](mailto:admin@alcema.co.uk) or <https://www.alcema.co.uk/get-in-touch>

## 2. Legitimate interests

We may process information where there is a legitimate interest for us in doing so.

Where we process your Personal Data on this basis, we do so having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether the processing (or not processing) might cause you harm; and
- whether you would expect us to process your data, and whether you would generally consider it reasonable for us to do so.

We may process your data on this basis for the purposes of, for example:

- record-keeping for the proper and necessary administration of our business;
- responding to unsolicited communication from you to which we believe you would expect a response;
- protecting and asserting the legal rights of any party;
- insuring against or obtaining professional advice that is required to manage organisational or business risk; or
- protecting your interests where we believe we have a duty to do so.

## 3. Contractual Necessity

We may process your Personal Data to provide you with a response to an enquiry or to pursuant to the provision of the Services.

## 4. Legal obligation

Sometimes we must process your Personal Data in order to comply with a legal or regulatory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

## COOKIES

Our website uses cookies to help us recognise different users of the website and to provide users of the website with a good experience when using it. Please see our Cookies Policy for further information.

## DISCLOSURE AND SHARING OF YOUR INFORMATION

### Information we obtain from third parties

Although we do not disclose your Personal Data to any third party (except as set out in this Privacy Notice), we sometimes receive data that is indirectly made up from your Personal Data from third parties whose services we use.

### Data Transfers outside of the UK and/or the European Economic Area (EEA)

Our websites are hosted in the United Kingdom.

We may also use outsourced services in countries outside the EEA from time to time in other aspects of our business. Accordingly, data obtained within the UK or any other country could be processed outside the UK and/or EEA. For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We shall not transfer any Personal Data to a third country outside of the UK and/or EEA unless we ensure that such Personal Data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

## **Sub-contractors**

We may use carefully selected sub-processors to help us collect, store or manage your Personal Data. This may include, without limitation, sub-contractors and our accountants, our insurers, professional advisers and our software platform providers. This will always be managed under appropriate data protection terms in accordance with the applicable Data Protection Legislation.

## **USE OF SITE BY CHILDREN**

We do not provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian.

## **SECURITY**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online. We will limit access to your Personal Data to those employees, agents, contractors and other third parties who need to know such information.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

We are Cyber Essentials Accredited.

## **RETENTION PERIOD FOR PERSONAL DATA**

Except as otherwise mentioned in this Privacy Notice, we keep your Personal Data only for as long as required by us:

- to provide you with the services you have requested;
- pursuant to our legitimate interests;
- to comply with the law, including for the period demanded by our tax authorities; or
- to support a claim or defence in court.

## **YOUR RIGHTS UNDER DATA PROTECTION LAWS**

You can exercise the following rights to your data by contacting us at [admin@alcema.co.uk](mailto:admin@alcema.co.uk) or <https://www.alcema.co.uk/get-in-touch>

### **Verification of your information**

When we receive any request to access, edit or delete Personal Data we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

### **Right of access**

You are entitled to receive confirmation as to whether your Personal Data is being processed by us, as well as various other information relating to our use of your Personal Data. You also have the right to a copy of the Personal Data

which we are handling regarding you. After receiving a request from you for a copy of any information that is not provided on our website, we will tell you when we expect to provide you with the information.

## **Right to rectification**

You have the right to require us to rectify any inaccurate Personal Data we hold about you. You also have the right to have incomplete Personal Data we hold about you completed, by providing a supplementary statement to us.

## **Right to restriction**

You can restrict our processing of your Personal Data where:

- you think we hold inaccurate Personal Data about you;
- our handling of your Personal Data breaks the law, but you do not want us to delete it;
- we no longer need to process your Personal Data, but you want us to keep it for legal reasons; or
- we are handling your Personal Data because we have a legitimate interest and you are in the process of objecting to this use of your Personal Data.

Where you exercise your right to restrict us from using your Personal Data, we will then only process your Personal Data when you agree, except for storage purposes and to handle legal claims.

## **Right to data portability**

You have the right to receive the Personal Data we hold about you in a structured, standard machine readable format, and to send this to another organisation controlling your Personal Data.

## **Right to erasure**

You have the right to require us to erase your Personal Data which we are handling where:

- we no longer need to use your Personal Data for the reasons that we collected it for;
- we needed your consent to use your Personal Data and you have withdrawn your consent;
- you object to our use of your Personal Data and we have no compelling reason to carry on handling your Personal Data;
- our handling of your Personal Data has broken the law; or
- we are obliged to erase your Personal Data in order to comply with a law to which we are subject.

If you wish us to remove your Personal Data from our website, you may contact us at [admin@alcema.co.uk](mailto:admin@alcema.co.uk)

This may limit the services that we can provide to you.

## **Right to complain**

### **Complaints to the ICO**

If you are in any way dissatisfied about how we process your Personal Data, you have the right to lodge a complaint directly with the Information Commissioner's Office (ICO), the data protection supervisory authority for England and Wales by going to <https://ico.org.uk/concerns/>.

### **Complaints to us**

If you are not happy with our Privacy Notice or if have any complaint then you should tell us by email. Our address is [admin@alcema.co.uk](mailto:admin@alcema.co.uk)

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified, or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

When we receive a complaint, we record all the information you have given to us, and we use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **Unsettled Disputes**

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

## **UPDATES TO THIS PRIVACY NOTICE**

We may update this Privacy Notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

This Privacy Notice was last updated in: 14<sup>th</sup> October 2024