



Title	Web Privacy Notice
Process Owner	Commercial Director
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Approved By	Management Team
Summary	Notice outlining how Middleton Asset Management uses and protects any information that is given when you use our website or services
Classification	Public
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Change Record
Enter any changes to the document within the tag below...
Address Update from Unit 7 to Unit 4 C/D



Web Privacy Notice

Middleton Asset Management (“MAM”) trading as Asset Disposal (referred to as “We, “Our” or “Us”) is committed to protecting the privacy and security of your personal data. We have developed this privacy notice to inform you of the data we collect, what we do with your data, what we do to keep it secure as well as the Rights you have over your personal data.

Throughout this notice we refer to data protection legislation which includes the UK GDPR and other laws mandating data protection including (but not limited to) the Privacy Electronic Communication Regulations 2003 and 2011.

ARM is a data controller for employee data and other activities such as marketing, and we are a data processor for the services we carry out for our clients who are considered as data controllers. This notice is designed to inform readers of this notice of how we act as both roles and our commitments to data protection in both capacities.

As we are based and headquartered in the United Kingdom (UK), we are registered with the Information Commissioners Office (the ICO) with registration number ZB539688.

Our principal place of business is at:

Middleton Asset Management Ltd.
Unit 4 C/D Cromwell Road,
Bredbury
Stockport
SK6 2RF
Telephone: 0161 641 4843
Email: info@asset-disposal.co.uk

We have appointed a Data Protection Officer, who can be contacted using the below details:

Evalian Limited
West Lodge, Leylands Business Park, Colden Common, Hampshire
Southampton
SO21 1TH
United Kingdom

Website: www.evalian.co.uk
Phone: (+44) 03330 500 111
Email: DPO@asset-remarketing.co.uk

Lawful Basis for Processing Personal Data



As a data controller we need to identify a lawful basis for processing personal data. Depending on the processing activity we would rely on the following lawful bases (the below are examples only):

Consent	For opting into marketing communications, newsletters, competitions etc
Contractual Obligation	To take steps into entering and concluding contracts of employment
Legal Obligation	Where needed for tax reasons such as UK HMRC purposes
Vital Interests	To ensure we know about medical conditions of our employees or onsite visitors should they require medical attention
Legitimate Interests	To help answer any questions or concerns that may be sent to us from individuals who we may have no prior existing relationship with

There may be instances of where we may need to process certain categories of data referred to as Special Category Personal Data. These may include personal data related to health, race and ethnicity as examples, but where identified and needed, we will ensure we consult our DPO to ensure the relevant special conditions are applied and documented where needed.

As a data processor we process personal data in line with the lawful basis determined by the data controller.

How We Use Personal Data

We may use personal data for various activities which can include the following:

- For own internal records
- To monitor website usage
- To process job applications
- Action any data subject right requests
- Communicate with relevant data controllers any communications received from a data subject including (but not limited to) data subject right requests
- Process an order for a product or other service
- Process payments
- CCTV recordings in our offices
- Seek your views or comments on the services we provide
- Notify you of changes to our services



- Handle an enquiry or complaint you have made
- Sending marketing communications and other company updates

The above list is non-exhaustive and representative.

We do not conduct any automated decision making or profiling within our organisation.

Where we use personal data as a processor we do so as per the data controllers written instructions which are normally set out in the relevant agreement with them.

For more information to how we use personal data you can contact us as detailed above.

Personal Data Collected

Due to the nature of our business and data processing activities we would collect and process various categories of personal data from various data subjects. The below gives examples of different categories of personal data collected and processed:

- Identity (e.g. full name, maiden name, photo ID)
- Contact details
- Addresses
- Financial information
- Financial transaction information
- Recruitment data (including right to work information)
- [...]

The above list is representative and non-exhaustive.

We collect personal data through several means. Examples can include:

- When you complete any online forms
- Give us feedback (e.g. complaint or compliments)
- When you apply for one of our job vacancies
- Contract us for services

The above list is representative and non-exhaustive.

Where we receive any personal data from data controllers these could include the above listed personal data items and possibly others not listed.

Recruitment and Criminal Data Processing

From time to time we may advertise job vacancies through Indeed.co.uk and we do not advertise vacancies on our website or through other websites such as LinkedIn. We also do not use any third



party recruitment agencies. Should we decide to do so in the future we will be sure to update our privacy notice along with other relevant details.

When we receive candidate information through our Indeed vacancies we may receive personal data such as your name, CV information and other information which may be used to help your application to stand out (e.g. may be immediately available). We will be sure to only retain candidate data for as long as reasonably necessary which is typically 6 months if a candidate is unsuccessful.

No positions within our company will require a criminal background check. If this was to change we will be sure to update our policies and notices where needed.

Children's Data

Our services are not specifically designed for children and for those under the age of 18. If we do become aware of anyone using our services who may be under 18 we will take all reasonable steps to ensure we do not process their data any further and will communicate this to them directly.

Data Sharing

Due to the nature of our business there may be at times we are required to share data with other departments and members of our organisation. Examples of when we may need to share data can include for recruitment purposes, IT concerns, and any questions or concerns regarding data protection received from other departments. Please note this can involve sharing of personal data with data controllers if we directly receive any communications from any data subjects.

There may also be instances where we may need to share data with any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation or (ii) to exercise, establish or defend our legal rights against any legal claims.

International Data Transfers

There may be instances where we may need to transfer your data outside the UK. We may need to share your data with companies who are in the European Economic Area (The EU member states, Norway, Iceland and Liechtenstein), in an adequate listed country or in other third countries who may not have similar data protection laws to the UK. If we need to transfer your information outside the UK we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.

Marketing Activities



We have a marketing team who are based in our head offices in Stockport. We carry out marketing in order to ensure those who are interested have opted in would like to receive news and updates on our organisation. We ensure if anyone would like to change their preferences (i.e. opt out) they can do so by clicking on the relevant unsubscribe link at the bottom of the email. You also have the ability to opt out by contacting us over phone or email should you chose to do so.

Your Data Protection Rights

If you are based in the UK (or EEA) you have several Rights to how an organisation processes your personal data. The Rights are as follows:

- Right to be informed
- Right to access data
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to objection
- Right to portability
- Right not to subject to automated decision making and profiling

If you would like to exercise any of the above Rights you can do so by sending us a written request to our email address mentioned above.

If we receive a Rights request as a data processor, we will forward the request to the data controller who may then contact you directly for additional information or to confirm if the Right is exercised or not.

How long we keep your data for

We will keep your personal data for no longer than is necessary for the purpose(s) it was provided for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We keep your data for the minimum period we consider necessary to resolve any queries and to ensure legal and regulatory compliance. We currently consider this period to be a maximum of 12 months for general enquiries and details of any orders or services will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 7 years unless the law prescribes a longer period.

As a data processor we will retain personal data for as long as required as set by our client data controllers. Where the data controller has determined the relevant retention period, we will be sure to document this. Further details of the periods for which we retain data are available on request.

Security of Your Personal Data



We are committed to ensuring that your information is secure. We endeavour to ensure that your data is stored securely and to prevent unauthorised access. We have security measures in place to protect your information which we monitor regularly. Such measures include certification with security frameworks such as Cyber Essentials and ISO 27001 and copies of our certificates can be found [here](#). If we become aware of any loss, misuse, alteration of personal data we will work closely with our IT team, DPO and other parties as necessary to investigate the incident at hand. We have put into place the relevant procedure and policies in place to investigate, mitigate and report (when needed to relevant parties) such instances.

Unfortunately, despite our best measures and efforts, because of the nature of the Internet, we cannot guarantee that your information will always remain at all times 100% secure. The continuing efforts of hackers to defeat even the newest of security systems means that we can never make this promise.

Cookies

We use cookies on our websites. More information to how we use cookies can be found in our cookie notice where you can also change your consent.

Links to Other Websites

This privacy notice does not cover the links to other websites. Those sites are not governed by this privacy notice, and if you have questions about how a site uses your personal data, you'll need to check that site's privacy statement

Concerns and Complaints

We understand you may have concerns and complaints to this notice and any aspects to how we process personal data. If you would like to contact us directly to talk to us about a concern or to raise a complaint, you can do so by using our contact details above.

You can also submit a complaint directly to the Information Commissioners Office (the ICO), the UK supervisory authority for data protection in the UK, via this link <https://ico.org.uk/make-a-complaint/>.

Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.