Version 5.2

# Classification Public



Title Privacy Policy

Process Owner Management Team

Date Created 16/06/2020

Publish Date 13/06/2024

Approved By CEO

Summary Policy outlining how Asset Disposal uses and protects any

information that is given when you use our website or services.

Classification Public

Standard All

Version 5.2

# **Change Record**

Enter any changes to the document within the tag below...

Updated to version 5.2

Overwrite the content of the tag, this will create each change you have made to the document and record it in ISOportal



## **Privacy Policy**

In this policy, "we", "us" and "our" refer to Middleton Asset Management Ltd trading as Asset Disposal ("AD"). This privacy policy sets out how AD uses and protects any information that you give when you use our online services or general services.

Your information is very important to us and we look after your information carefully in line with data protection and privacy laws. Here you'll find information on how we use and protect any data/information that you give to us when using our services.

Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will only be used in accordance with this privacy statement.

## How we use your Personal Data

In order deliver and provide excellent ongoing customer service, we need to obtain and retain certain personal data. The following sections provide more detail on the data we collect from you and what happens to that data.

#### What We Collect

The following sections provide more detail on the data we collect from you and what happens to that data.

Personal data means any information about an individual from which that person can be identified. It does not include data, where the identity and identifying information has been removed ("Anonymised Data").

We may collect the following information:

- Your Full name
- Contact details including email address and phone number
- Contact History
- Marketing Activity consent
- Information about your device and how you use our site

## How we use your information

We require this information to understand your needs and provide you with a better service. The information collected regarding you and/or your company will be solely used for business purposes only.



#### **Full Name and Contact Details**

We capture your name and contact details so we can:

- contact you regarding any enquiries you have
- to provide you with information regarding our services by email
- to notify you about changes to our services
- in order to prevent and detect fraud against you or AD

# **Contact History**

To manage our relationship with you and to provide a high level of customer service we may keep records of your contact history. We are required to do this to stay in contact with you, until the time you do not wish to be contacted.

### **Marketing Activities**

- We will only send you marketing messages if you indicate that you consent (e.g. by "optingin") to receiving such messages. Where we have your consent or are otherwise permitted to do so, we may:
- send you information by email, telephone, mail or other methods of communication about existing and new services and industry news that may be of interest to you;
- send you information by email, telephone, mail or other methods of communication about related products or services that may be of interest to you

Each email we send will clearly provide the opportunity for you to unsubscribe from this service.

### Information about your device and how you use our site

We may collect information about the devices you use, such as your mobile or browser and information about how you move around our website This helps us to improve our website for you and allows us to give you a better experience. This data will be anonymised and will not include any of your personal details.

This information may also be used in fraud prevention allowing us to earmark suspicious activity and prevent other people's details from being used fraudulently.

You don't have to give us any of this personal information but if you decide not to provide it, you are unlikely to receive our optimal overall customer experience. But that is your choice and we understand that. If you have queries about sharing your data with us please contact us



#### **Email Service Provider**

In order to send you information by email, We work with and number of emailing providers. Each email we send will clearly provide the opportunity for you to unsubscribe from our services.

### Your rights to access your information

We want you to feel safe with us having details and we want to keep you informed about how we use the information you give us.

You have the rights to:

- be informed about how your personal data is being used
- access any information we hold about you
- request correction of your personal data
- restrict processing
- object to the processing of your personal data
- request erasure of your personal data
- the right to withdraw consent

You have the right to view, update, amend or delete any personal data we hold about you, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.

Please get in touch with us at <a href="mailto:info@asset-disposal.co.uk">info@asset-disposal.co.uk</a>, We will try to respond to all legitimate requests within one month. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of the above rights. This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it. We will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

### 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.



Further details of the periods for which we retain data are available on request.

### **Maintenance and Security of Your 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.

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 on this site

Cookies are small text files that are stored on your browser or the hard drive of your computer or other devices when you visit the Site. We use cookies on our website. For more information on cookies, please see our cookie notice.

### **Links to Other Websites**

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

#### **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.

If we make significant changes we will make that clear on the website (<u>www.asset-disposal.co.uk</u>) or by some other means of contact such as email.

Our principal place of business is at:

Middleton Asset Management Ltd T/A Asset Disposal.

Unit 4 C/D Cromwell Road, Bredbury, Stockport. SK6 2RF.

You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website contact us page; or
- (d) by email, using the email address published on our website.