



Standard of Business Conduct: Privacy & Data Protection

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1. Scope

CEA is a company registered in England and Wales under number 11114584. We are also registered with the Information Commissioners Office (ICO) under number ZA731336 (<https://ico.org.uk/ESDWebPages/Entry/ZA731336>)

This Standard relates to information which is obtained by CEA and for which CEA is the Data Controller and the Data Processor. This means that we decide on when, what, how, and why the data is collected and used.

If you have any questions regarding this Standard, please contact our Data Protection Officer by email privacy@ceaenvironmental.co.uk.

If you are a CEA client, employee, subcontractor or associate, subscriber, or just visiting our website, this Standard applies to you.

2. Definitions

Data	information that is processed or intended to be processed, whether it is stored electronically or in manual filing systems. This includes personal data and sensitive personal data.
Data Subject	an individual who is the subject of the personal data. In other words, it is the person to whom the data relates. Data subjects have rights under data protection laws, including the right to access their personal data and the right to have their data processed fairly and lawfully
Data Controller	an entity or person who determines the purposes and means of processing personal data. The data controller is responsible for ensuring that processing activities comply with data protection laws. This can be an individual, a public authority, an organisation, or any other body that decides why and how personal data is processed
Data Processor	an entity or person who processes personal data on behalf of the data controller. Data processors act on the instructions of the data controller and may include IT service providers, cloud service providers, or other organizations that handle personal data on behalf of another entity

3. Data Collection

From the first moment you interact with CEA, we are collecting data. Sometimes you provide us with data, sometimes data about you is collected automatically.

3.1. When and How we collect data

Data can be collected in a number ways, for instance:

- You browse any page of our website or social media
- You request a quote or proposal from us or make an enquiry
- We contact you directly or via your company
- You complete our Contact us Form
- You provide us with a business card or contact details



- You contact us directly (via the website, email, telephone, at an event, or other way)
- You opt-in and consent to direct marketing messages or use our social media
- You or your business contract with us

The data we collect is different depending on our relationship with you, for instance, whether you are a customer of CEA, a member of the CEA team, a supplier, or someone visiting our website or other social media.

3.2. What information we collect

The data we collect is different depending on our relationship with you, for instance, whether you are a customer of CEA, a member of the CEA team, a supplier, or visitor to our website.

3.2.1. Contact details

We collect your name, address, telephone number, email address. If your information is provided as part of our services to you or your employer, those details will only ever be processed in accordance with the contract between you or your employer and us.

3.2.2. Financial information

We will retain records of any financial transaction with us.

3.2.3. Data that identifies you

Your IP address, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version, etc.

3.2.4. Data on how you use CEA's website

Your URL clickstreams (the path you take through our site), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.

3.2.5. Sensitive Data

We don't collect any "sensitive data" about you (like racial or ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, data about your sexual life or orientation, and offences or alleged offences) except when we have your specific consent, or when we have to in order to comply with the law.

CEA is a business-to-business service directed to and intended for use only by those who are 18 years of age or over. We do not target our services at children, and we do not knowingly collect any personal data from any person under 16 years of age.

3.3. Why we collect this information

The information which you provide to us, along with other information relating to you, will be held by CEA, and used for the following purposes, and under specific lawful basis or lawful reasons.

The law allows for different ways to legally process personal data (and additional ways for sensitive personal data). Only some of these are relevant to how we process data:

PURPOSE	DATA PROCESSED	LEGAL BASIS
Business Governance	Delivery of our services	Contract Legal Obligation



	Statutory and financial reporting and other regulatory compliance purposes Transfers of data to those required to be involved in order to carry out those purposes	Legitimate Interests
Administration & Operational Management	Responding to solicited enquiries Providing information and services Research Data Analytics Employment and recruitment administration	Contract Legitimate Interests
Internal Record Keeping	Records (including contact details) of those who we have provided services to. Records of those we have received enquiries and communicated with.	Legitimate Interests Legal Obligation
Marketing Communications	Sending marketing information about our services, promotions and relevant promotional materials.	Consent
Contracted Services	Fulfilling contractual obligations entered into with customers	Contract

3.3.1. Legitimate Interests

Personal data may be legally collected and used if it is necessary for a **legitimate interest** of CEA, if its use is fair and does not adversely impact the interests, rights and freedoms of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in a reasonable way. Our legitimate interests include:

- Company Governance: including statutory and financial reporting and other regulatory compliance purposes, and transfers of data to those required to be involved in order to carry out those purposes.
- Administration and operational management: including responding to solicited enquiries, providing information and services, research, data analytics, events management, the administration of employment, and recruitment requirements.

4. Employees

In addition to the information in this standard, there are some individuals whose personal data is used for specific purposes that are covered by other privacy statements:

4.1. Applicants

As part of any recruitment and joining process, CEA collects and processes personal data relating to job applicants.

4.2. Employees

Once you have taken up employment with CEA, we will supply you with more details on the use and storage of your data using our Data Consent Form.

5. People who use our Online Services



We hold the details of the people who have requested our services so we can provide them. However, we only use these details to provide the service the person has requested. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

5.1. Electronic Communications

To those who subscribe to our mailing list (including our families and supporters), we send out regular e-newsletters, details of upcoming events, and other useful local updates and information.

We use a third-party service, MailChimp, to manage this. We may gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletters. For more information, visit www.mailchimp.com/legal/privacy/

5.1.1. People who contact us via social media

We manage our social media interactions via Facebook, LinkedIn, Twitter, and Instagram. If you send us a private or direct message via social media, the message may be stored by the social media website as per their privacy policy. It will not be shared with any other third party by us. To view their privacy policies, visit:

- Facebook - www.en-gb.facebook.com/full_data_use_policy
- LinkedIn - <https://www.linkedin.com/legal/privacy-policy>
- Twitter - <https://twitter.com/en/privacy>
- Instagram - https://help.instagram.com/519522125107875/?helpref=uf_share

5.1.2. People who email us

Any email sent to us, including any attachments, may be monitored, and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software is also used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

5.1.3. People who message us via our websites contact form

We use a third-party provider, Mailgun, to manage our email traffic from our website. Mailgun is a company based in the USA, but Mailgun participates and has certified its compliance with the EU-U.S. Privacy Shield Framework.

If you send us a direct message via the website, the message will be stored by Mailgun temporarily. It will not be shared with any other organisations or third parties. For more information about how Mailgun processes data, please see their Privacy Policy here: <https://www.mailgun.com/privacy-policy>

5.2. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

6. Security and Performance

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online and in completing our services to you.



We process any personal data identified in this Policy where it is deemed necessary for the purposes of maintaining insurance coverage, managing risks, obtaining professional advice, or establishing, exercising, or defending legal claims, we do this for the proper protection of our business. We also process such data where processing is required to comply with a legal obligation to protect yours or another person's vital interests.

6.1. How we look after your data

We ensure that there are appropriate technical controls in place to protect your personal details in accordance with current data protection legislation; this includes secure cloud servers, firewalls, and SSL encryption.

6.2. How long we keep your data

We keep your data for no longer than necessary for the purposes for which it was collected, considering guidance issued by the Information Commissioner's Office (ICO).

The length of time that data will be kept depends on the reasons for which we are processing the data as well as any applicable or regulations that the information falls under, such as financial regulations, Health and Safety regulation etc., or any contractual obligation we might have – such as local government contracts.

For example, we will keep a record of financial transactions for six years to comply with HMRC rules.

If you request to receive no further contact from us, although we will act on that, we will keep some basic information about you on our suppression list to enable us to comply with your request.

Below is a summary of our data retention schedule.

DATA TYPE	RETENTION PERIOD
Payment Transaction Records / Financial and account records	6 years
Website analytics	7 years
Employee application forms, CV's	Successful – 7 years after engagement (employees), Unsuccessful – 6 months
Employee Personnel file – non-essential elements	7 years after engagement (employees) Indefinitely (limited record of employees)
Emails/communication records	As soon as possible (maximum 5 years)
Customer data	10 years

6.3. How secure is the data we collect?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect.

And please remember:

- You provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
- If you believe your privacy has been breached, please contact us immediately at privacy@ceaenvironmental.co.uk



6.4. Where do we store the data?

The personal data we collect is processed at our offices and in any data processing facilities operated by the third parties identified above.

By submitting your personal data, you agree to the transfer, storing, and processing by us. If we transfer or store your information outside the UK in any way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice.

6.5. How we monitor our data security

CEA is committed to ensuring the security of your Personal Data. Your information is stored using appropriate technical and organisational measures to ensure its security, we monitor this by:

- regular review of security measures of all data storage systems and emerging security risks
- regular training of our staff that access the information. We keep your personal information in accordance with our Retention Policy, which considers:
- the purpose(s) for which the information was collected and how long we need to keep the information to achieve the purpose
- any applicable legal, accounting, reporting or regulatory requirements to keep the information.

6.6. Transferring your information out of the UK

We may transfer your Personal Data out of the UK where our service providers referred to above are based outside or have servers outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards is implemented:

- We ensure that the country we are transferring the data to has been deemed under UK data protection laws to provide an adequate level of protection for Personal Data.
- If the country has not been deemed to provide an adequate level of protection, we use specific contracts approved for use under UK data protection laws which give Personal Data an equivalent level of protection as it has in the UK.

7. Third Parties

As part of our services to you, and in the day to day running of our business, we use some third-party support or software. Before contracting with any supplier, we review their data protection policies and processes to ensure that your (and our) data will be suitably protected when processed by them and assess where their data is stored.

7.1. Use of Third Parties

The legal basis for processing this data is both our legitimate business interests, namely the proper administration of our business, consent, or the performance of a contract between us and/or taking steps, at your request, to enter such a contract.

A summary of our online based suppliers are listed below:



Microsoft 365

We use Microsoft 365 to manage all our email communications and we use SharePoint to store our electronic files and data. You can review their privacy policy here: <https://www.microsoft.com/online/legal/v2/?docid=43>



Xero Accounting

We use Xero for our own accounting software. Xero take their responsibilities under GDPR seriously. That's why they've embarked on a programme to identify which measures they need to implement to be compliant with GDPR.

You can read more about their privacy processes here:

<https://www.xero.com/uk/about/terms/privacy/> and

<https://www.xero.com/uk/gdpr/>



Microsoft Azure

Microsoft Azure is used for secure cloud storage. Their privacy notice can be found at <https://privacy.microsoft.com/en-gb/privacystatement>



Adobe Cloud

Adobe Document Cloud is sometimes used to manage our pdf and e-signature solutions. <https://www.adobe.com/uk/privacy.html>



HubSpot

We use Hubspot as our CRM system.

<https://legal.hubspot.com/privacy-policy>

8. Cookies & Analytics

If you browse, read pages, or download information from our website, we will gather and store certain limited information about your visit. This information collected or stored is used by us only for the purpose of improving the content of our web services and to help us understand how people are using our services.

8.1. Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. If you do not wish for your data to be processed this way, please do not enter our website.

Google Analytics automatically collects and stores the following information about your visit:

- The Internet Protocol (IP) address and domain name used. The IP address is a numerical identifier assigned either to your internet service or directly to your computer. We use the IP address to direct internet traffic to you. This address can be translated to determine the domain name of your service provider (e.g., abccompany.com, xyz-school.edu, and so on)
- The type of browser and operating system you used
- The date and time you visited this site
- The web pages or services you accessed at this site; and
- The website you visited prior to coming to this site.



The legal basis for processing this data is both our legitimate business interests, namely monitoring and improving our website and services.

8.2. Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

9. Complaints and Queries

CEA tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide in exhaustive detail of all aspects of CEA collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

9.1. People who make a complaint to us

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant, and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually need disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

10. Controlling your Personal Information

- We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so.



- You may request details of personal information which we hold about you under the Data Protection Act 2018 and UK GDPR.
- If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

10.1. Access to personal information

CEA tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018 and subsequent legislation. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to CEA for any personal information we may hold you need to put the request in writing addressing it to our Data Protection Officer at our registered office or emailing it to the address provided below.

Data Protection Officer

•Email: privacy@ceaenvironmental.co.uk
•Address:
Mountbatten House, 1 Grosvenor Square, Southampton, Hampshire,
SO15 2JU

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need. You will be asked for proof of your identity before we are able to provide you with the information requested.

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of another (e.g., another person's confidentiality). We'll tell you if we can't meet your request for that reason.

10.2. Your rights

You have specific rights under data protection legislation. You can exercise these rights by emailing us. Please visit the Information Commissioners Office website to learn all about the rights you have:

<https://ico.org.uk/for-the-public/>



- Transparency over how we use your personal information
- This privacy notice, as well as any additional information that is provided to you either at the time you provided your details, or later, is intended to provide you with this information.

Right to be Informed



- Request a copy of the information we hold about you – this is sometimes called a data subject access or data subject request. We will supply requested information that we hold about you as soon as possible, within 30 days. You will be asked for proof of identity for us to do this.

Right of Access



- Update or amend the information we hold about you if it is wrong

Right of Rectification



- Ask us to stop using your information
- In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right to Restrict Processing



- Ask us to remove your personal information from our records
- Note: where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future

Right to be "Forgotten"



- Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time.

Withdraw Consent



- Object to the processing of your information for marketing purposes
- You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post).

Right to Object



- Obtain and reuse your personal data for your own purposes

Right to Data Portability



- Not be subject to a decision when it is based on automated processing

Rights relating to Automated Decisions & Profiling

