



## Privacy Notice

'Personal data' is information relating to an identifiable person, including identifiers such as name, contact details or other information from which an individual can be identified.

This privacy notice explains what personal data is held by Cirrus Purchasing Ltd (Cirrus), and how we use it. There is a separate privacy notice applicable to Cirrus employees and job applicants.

### What information do we hold about you?

Cirrus provides business to business services so all interactions are between Cirrus and external supplier and client organisations (actual and potential). Personal data that Cirrus comes into contact with relates to persons connected with those organisations.

Cirrus does not process any sensitive personal data ('processing' means holding or using your information).

- ▶ Your name, title and job title
- ▶ Your contact details including your work telephone number/work mobile number and your work email address
- ▶ Correspondence between you and Cirrus

The name and contact details we process are either provided by you, your organisation, your business associates or where you have published them through the internet (e.g. when requesting bids from suppliers through Contracts Finder).

### How will this information be used, and why?

We use your information to communicate with you, to provide services and manage our internal business operations.

We do not sell your information to third parties.

The lawful bases for us to process your personal data are:

1. Processing is necessary for the performance of a contract (e.g. we need to communicate with clients to deliver projects)
2. The information we process is essential to enable Cirrus to function, so there is a legitimate interest to use this minimal amount of personal data (e.g. without contact details we could not interact with our clients)
3. We have a statutory obligation to process some personal data (e.g. contact details on invoices)

## Who will this information be shared with?

Your information may be shared with the following outside agencies:

- ▶ Where a supplier organisation has included personal contact details as part of a tender submission, these will be passed onto the client or clients the tender relates to
- ▶ When we are bidding for work we are sometimes required to provide client references. We will always ask for your consent to cite you as a reference before passing those details to another potential client
- ▶ In the event that it becomes necessary to use outside agencies to deal with an outstanding issue, such as non-payment of invoices or litigation, the relevant information may be passed to those agencies
- ▶ To a statutory body where processing is necessary for compliance with a legal obligation

Additionally, core Cirrus business systems are based on cloud technology, including our accounting system. This means data is stored in online servers hosted by our cloud service providers, for Cirrus use.

## How long will we keep this information?

Some types of records that may include personal data have statutory minimum retention periods (e.g. invoicing records): This sets a minimum time that Cirrus will keep these types of records.

Cirrus keeps records of project work and communications beyond the end of a project that may be required for reference by the parties involved (e.g. as evidence for dispute resolution). This provides effective long term customer service, and also mitigates risk for all parties in the event of a deferred issue arising that may require evidence to resolve.

Records like these may include some personal data such as the work contact details of individuals within supplier and or client organisations included in related correspondence or tender submissions that are applicable to the project.

When there is no longer a legitimate business need to retain these records, they are disposed of. The review and deletion of personal data that is no longer needed is done on a cycle of a minimum frequency of once per year.

## Your rights

You have certain statutory rights under UK GDPR legislation. These rights are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

For detailed information about your rights, please visit: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you are not satisfied that our processing of your personal data is consistent with the law you have a right to complain to the Information Commissioner's Office: <https://ico.org.uk/>.

*Implemented May 2018, reviewed August 2021*