



## Privacy Notice

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### Privacy Notice – definitions and contact details

This is the privacy notice of Adan Limited. The version date is shown above.

- In this document, the use of 'we', 'our' or 'us' all refer to Adan Limited.
- We are registered in the United Kingdom, Company Registration Number 942611.
- Our registered office is: Albion House, 32 Pinchbeck Road, Spalding, Lincolnshire, PE11 1QD.

### Introduction

1. This notice informs you of our policy regarding all the information we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you supply to us. It covers information that could identify you ('personal information') and information that could not. In relationship to GDPR law and this notice the word 'process' means to collect, store, transfer, use or otherwise act on information.

2. We take seriously the protection of your privacy and confidentiality. We understand that all clients, suppliers and staff, are entitled to know that their personal data will not be used for any purpose unintended by them and will not fall into the hands of a third party. This does not include trusted third parties who assist us with the conducting our business, so long as those third parties agree to keep the information confidential.

3. We undertake to retain the confidentiality of all information you provide to us, and trust that you will do the same with information about us.

4. Our policy complies with UK law including that required by the EU General Data Protection Regulation (GDPR).

5. The law requires us to tell you about your rights and our obligations to you with regards to the processing and control of your personal data. In order to do this we request that you read the information provided at: [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)

6. Except as explained below, we do not share, sell or disclose to a third party, any information collected by officers of this company or through our website.

### The basis upon which we process information about you:

The law requires us to outline under six defined bases how we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes by law we shall notify you of the change and the new basis under which we have identified that we can continue to process your information.

#### 1. Information we process because we have a contractual obligation with you

When you buy a product or a service from us, or you otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligation under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to: sell products to you, provide you with our services, provide you, by any means, such as: email, telephone call, direct mail or letter, with suggestions and advice on products, services, company news and events.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with you consent**

There are some occasions when there is no contractual relationship between us, for example, when you browse our website or ask us to provide you with more information about our business, including work opportunities or our products and services. In such cases you provide your consent to process information that may be personal information.

You would give your consent implicitly, for example, when you contact us in any way which you would expect us to reply to.

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 gather it in a general way and use it, for example monitor the performance of the company.

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: [steve@adanltd.co.uk](mailto:steve@adanltd.co.uk) However if you do so you may not be able to procure our products and services.

## **3. Information we process because we have a legal obligation**

Just like all other companies and individuals, we are subject to the law. We must sometimes process your information in order to comply with a statutory obligation.

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

### **Specific uses of information you provide to us:**

## **4. Information provided on the understanding that it will be shared by a third party**

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who may use it. Once your words and information enter the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

## **5. Complaints regarding content on our website**

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 feel the law requires us to do so, we shall remove the content while we investigate. If we think your complaint is without any basis, we shall not correspond with you about it.

## **6. Information relating to your method of payment**

Payment information is never taken by us or transferred to us through our website. Bar the website hosting company, no employees or contractors have access to the website.

Where payments are made to RBSIF, they alone have your payment information, we do not. Payments made directly to us, or by us, via bank transfer, your payment information is held securely on our server. Where card payments are used they are processed by Payment Sense via their secure website.

## **7. Job application and employment**

If you send us information in response to a job application, with your permission we may keep it for up to six 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 employment information will be used only for purposes directly relevant to your employment. For more details refer to our data retention policy.

## **8. Complaining**

We record all the information you have given us when we receive a complaint. We use that information to resolve your complaint. If your complaint reasonably requires us to contact another relevant person or company, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently and as sensitively 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 might be.

## **Disclosure and sharing of your information**

### **9. Credit reference**

To assist in combating fraud, we sometimes share information with credit reference agencies.

### **10. Debt collection**

In the course of collecting debt we use RBSIF.

### **11. Access to your personal information**

To obtain a copy of any personal information that we hold about you, you may send a request to [steve@adanltd.co.uk](mailto:steve@adanltd.co.uk). After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for its supply.

### **12. Verification of you information**

When we receive any request to access, edit or delete personal information we will take reasonable steps to verify your identity before granting you access or otherwise taking any action. We do this in order to safeguard your information and identity.

## **Other matters**

### **13. Use of site by children**

We do not sell products or provide services for purchase by children, nor is our marketing aimed at children and young people. If you are under 18, you may use our website only with consent from a parent or guardian.

#### **14. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificate to verify our identity to your browser and 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.

#### **15. How can I complain**

1. If you are not happy with our privacy policy, or have any complaint, then you should tell us by email. Our address is [steve@adanltd.co.uk](mailto:steve@adanltd.co.uk)
2. If a dispute is not settled then we hope you will agree to resolve it by engaging in good faith with us in a process of mediation or arbitration.
3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office for an independent review. This can be done at <https://ico.org.uk/concerns/>

#### **16. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us: to provide you with products/services you have requested, to comply with other law, including for the period demanded by our tax authorities, to support a claim or defence in court.

#### **17. Compliance with the law**

Our privacy policy has been compiled to comply with English law.