

Iris Emissions Services Limited takes data protection seriously. This document outlines the key factors in addressing data protection requirements and how we implement this.

1. Who we are and important information
2. Identification of what data is held and where it is held
3. How personal data is obtained, used, how it is accessed and who accesses it (including visiting our web site)
4. Protection – how is personal data kept safe
5. Reporting – Managing potential breaches in data protection, keeping on going records

## 1. Who we are and important information

IRIS Emissions services Ltd provide service support to the CEMS industry. In order to efficiently conduct this business certain data needs to be collected. This privacy notice aims to give you information on how we collect and process your personal data through our business with you and use of our web site. You can find out more about your legal rights from Information Commissioners Office.

<https://ico.org.uk>

IRIS esl keep data relating to customers, suppliers, directors, sub contractors and other interested parties. We act as both data controller and processor, with the exception of internal employee payroll, which is processed externally.

Our registered address is: 4 Cyrus Way, Cygnet Park, Hampton, Peterborough, PE7 8HP

Our trading address is: 28-29 Maxwell Road, Woodston, Peterborough, PE2 7JE

For all matters relating to privacy contact on enquiries@irisesl.com

## 2. Identification

Personal data or information means any information about an individual from which that person can be identified.

We may collect, use or store and transfer different kinds of personal data. This data includes:

Name and title of person

Phone numbers

Email and postal addresses

Financial details of suppliers and employees for the purpose of payment

Training records and professional certificates for employees and sub contractors which may include date of birth, passport details and qualifications.

Transactional data for customers and suppliers

The data may be held in several places:

In our cloud based accountancy system (Xero)

In our cloud based data drive (Microsoft Office 365 Business)

In a cloud based email host provider

Our online banking account contains financial information (Santander)

Paper copies of information may be held for short periods of time whilst work is carried out.

Phone numbers and email addresses may also be stored on individual's mobile phones

Email archives

If you fail to provide personal data needed by law or under the terms of a contract we have with you, we may not be able to perform the contract we have or are trying to enter into with you. In this case we may have to cancel the service and will notify you if this is the case.

Personal data relating to the business should not be held on the C drive of employee computers.

### **3. How is the data obtained, used and accessed?**

Data held by IRIS esl is obtained and used on a contractual basis for the purposes of conducting the current and future activities of the business, fulfilling our contracts and for our legitimate interests. Some data may also be held to fulfill legal obligations (e.g. health and safety records)

We make sure we consider and balance potential impact on individuals and their rights before we process any data.

Data is used for business activity including planning of work, sales, purchasing, marketing and completing commercial transactions. The data held is not shared\* with third parties outside of the contractual, legitimate interest and legal needs of the business activity.

\*See special note on web site.

The data held can be accessed only by a user with the correct secure log in details to the relevant cloud based drive.

People having access to all data are the Directors.

Appointed Sub contract engineers have secure access specifically to current and historic health and safety data and customers contact details. They may also have access to an assigned @irisesl email address (including historic mail on this address) for business communications.

Our appointed accountants have secure access to the cloud based accountancy system.

Records may be stored for the life of the business relationship and up to 5 years beyond this.  
Paper records are destroyed by shredding.

Any data subject has the right to know what data is held and raise an objection to this for consideration.

### **Web site**

The irisesl.com web site is intended for business use only. It is not intended for children and we do not knowingly collect data relating to children.

This website may include links to third party websites, plug ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party web sites and are not responsible for their privacy statements. We encourage you to read the privacy notice of every website you visit.

Data is collected via contact us forms which are forwarded to the appointed irisesl email address.

Contact data is not stored on the website.

Anonymous data may be collected by Google Analytics, using cookies to capture IP address of subject only, for the purpose of analysis and legitimate interest of the business.

You can set your browser to refuse cookies or to alert you when websites access cookies. If you disable or refuse cookies some parts of the website may become inaccessible or not function correctly.

#### **4. Protection -how we keep the data safe**

Keeping data safe from loss and unauthorized access is essential to the smooth running of the business. The use of cloud based technology puts this protection into the hands of experts in this field.

IRIS esl reasonably expect that by using secure on line banking, cloud based accounting and data storage that our business data, including that of our customers and suppliers, will be handled in a manner to comply with data protection regulation.

Those working on behalf of IRIS esl must implement password protection on computers and phones which are used for business to protect against unauthorized access in the event of loss.

#### **5. Reporting**

IRIS esl endeavour to keep accurate records and up to date documentation defining processes as part of our quality policy. The following outlines the how we would deal with the unlikely event of a date breach.

If a data breach is discovered an assessment of the likely impact of that breach is made within 48 hours.

If the breach is likely to result in a significant detrimental effect on an individual, or put them at risk, then the individual and the ICO will be notified within 72 hours.

A record of any data protection breach, or near miss, is recorded within the accident / incident reporting system.

