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## Roles and Responsibilities

### Executive Management:

- **Overall Responsibility:** Sets the overall tone and commitment to data privacy within the organization.
- **Resource Allocation:** Provides adequate resources for privacy compliance and data security initiatives.
- **Risk Management:** Oversees the identification and mitigation of privacy risks.
- **Public Communication:** Approves and oversees communication regarding data breaches or privacy incidents.

### Legal Department:

- **Develops Privacy Policies:** Drafts and reviews the organization's privacy policy to ensure compliance with regulations.
- **Contracts and Agreements:** Reviews contracts with third-party vendors to ensure they meet data protection requirements.
- **Legal Compliance:** Advises on the interpretation and application of data protection laws and regulations.

### Information Technology (IT) Department:

- **Data Security:** Implements and maintains technical safeguards to protect personal data (e.g., encryption, access controls).
- **Incident Response:** Leads the response to data breaches and privacy incidents.
- **System Administration:** Ensures user access to data is granted based on the principle of least privilege.
- **Data Retention and Disposal:** Establishes procedures for data retention and secure disposal of personal data.

### Human Resources (HR) Department:

- **Employee Training:** Develops and delivers training programs to educate employees on data privacy policies and procedures.
- **Recruitment:** Ensures compliance with data protection regulations during the recruitment process.
- **Disciplinary Action:** Addresses any employee misconduct related to data breaches or privacy violations.

## HL Privacy Policy

### Privacy Officer:

- **Leads Privacy Program:** Oversees the overall data privacy program and ensures its effectiveness.
- **Data Subject Requests:** Manages individual requests to access, rectify, or erase personal data.
- **Privacy Impact Assessments:** Conducts privacy impact assessments for new projects involving personal data collection.
- **Vendor Management:** Reviews and approves data sharing practices with third-party vendors.

### Individual Employees:

- **Data Handling:** Handle personal data with care and only for authorized purposes.
- **Reporting Concerns:** Report any suspected data breaches or privacy violations to the appropriate team.
- **Data Security:** Use strong passwords, be mindful of phishing attempts, and follow data security best practices.

## Security and performance

We Henry Ling Ltd, company registration number 224715, located at The Dorset Press, Dorchester DT1 1HD maintain the security and performance of our data handling systems and website through controls which are part of our Information Security Management System (ISMS)

We have carried out assessments of the legal basis for processing personal data and have concluded that this is necessary on the grounds of contractual and legal obligations together with our legitimate interests for the use of customer and employee data for our commercial interests and employment respectively.

## How we use your information

This privacy Policy tells you what to expect when we collect and process personal information. For professional personal data (e.g. business related data) the legal basis for this is our legitimate interests, namely the control and maintenance of our website and/or business administration and/or the performance or creation of a contract between you and us. For employment related personal data, the legal basis for this is our legitimate interests, namely the protection and assertion of legal rights and/or the performance or creation of a contract between you and us as an employer and/or employment and fiscal legal obligations`

We will not store any of your information outside of the European Economic Area [EEA]

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Should we decide to process any personal data for a purpose other than that for which it was collected, we will provide you with information on that other purpose and with any relevant further information prior to that further processing.

### Visitors to our websites

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

In order to provide you with our products and services, or to reply to any enquiries, we collect professional information (e.g. business related data) about you and your company submitted to our websites, our ftp sites, passed on during telephone conversations, included in emails and mobile messaging and any other form of written or verbal communication. For example, we might keep a record of your name, work address and associated delivery addresses, work email address and work telephone number/s.

We will store this data for 3 months

We have detailed below the 3<sup>rd</sup> parties we share your data with

Where we want to collect personal data we will make this clear and will explain what we intend to do with it.

By continued use of our website, you consent to the Company collecting analytical and professional information about you and your organisation in accordance with the terms set out in this Policy. You also consent to the Company using the analytical and professional information for market research, marketing, sales, customer relationship management (CRM), operational, financial and legal purposes in accordance with the terms set out in this Policy.

### Services

We offer various goods and services to the public and professionals. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a service to carry out a survey to find out if they are happy with the level of service they received.

## Cookies

The Internet browser that you use may make use of a feature called a "cookie" to assign identification to your computer. We do not use cookies to store personal data or to link personal data to non-personal data, unless you have first agreed to this by selecting the "Remember Me" option. If you select this option, a cookie will be placed on your computer which will allow our website to recognise you when you return to our website. No personal information will be stored in this cookie.

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit [www.aboutcookies.org](http://www.aboutcookies.org) for detailed guidance.

The following table describes the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete our cookies having visited the site.

### Persistent Cookies for Site Analytics and Performance

Cookie name	Purpose
Google (Analytics) _utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.  More information: <a href="#">Google Analytics Privacy Policy</a>

## Social media

Henry Ling Limited does not currently utilise Social Media.

## Email

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 may also be 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.

## Complaints

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 staff members 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 have to disclose the complainant's identity to whoever the complaint is about. 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 six 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.

## Applicants, current and former employees

We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at the address given at the end of this Policy, under "Contact Us"

## What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, and to fulfil contractual and legal or regulatory requirements if you are offered a position.

We will not share any of the information you provide during the recruitment process with any third parties for marketing. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

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We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

If we make a offer of employment we will ask you for information so that we can carry out pre-employment checks.. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

- We may contact your referees, using the details you provide in your application, directly to obtain references
- We may also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Membership of a Pension scheme.

If you are employed by us, relevant details about you will be provided to Moorepay who provide payroll services to us This will include your name, bank details, address, date of birth, National Insurance Number and salary. This link shows Moorepay Privacy Policy <https://www.moorepay.co.uk/cookie-policy/>

Likewise, your details will be provided to Hughes Price Walker and Aegon who are the administrators of our Life Assurance and Pension Scheme,. You will be auto-enrolled into the pension scheme and details provided to Aegon will be your name, date of birth, National Insurance number and salary. These links are to their Privacy Policies <https://www.aegon.co.uk/support/faq/privacy.html>

<http://www.hughespricewalker.co.uk/s/HPW-Privacy-Policy-external.pdf>

## Health Management

If we make you a conditional offer, we will ask that you complete a questionnaire which will help to determine if you are fit to undertake the work that you have been offered, or advise us if any adjustments are needed to the work environment or systems so that you may work effectively. We use The **Occupational Health and Wellbeing Service** at Dorset HealthCare

Here is a link to their Privacy Policy. <https://www.dorsethealthcare.nhs.uk/privacy-and-cookies>

## How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the recruitment campaign.

## Your rights

Under the Data Protection Act, you have rights as an individual which you can exercise in relation to the information we hold about you

You can read more about these rights at;

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

To make an enquiry about any personal information we may hold, you need to put the request in writing addressing it to our Data Protection Officer, at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do hold information about you, you can ask us to correct any mistakes or exercise any of your other rights by, once again, contacting the Data Protection Officer.

## Disclosure of personal information

Generally we will not disclose personal data to third parties not listed in this Policy without your consent. However there may be circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics

## Complaints or queries

We try 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 Policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However,



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we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact the ICO (the statutory body which oversees data protection law) at;

<https://ico.org.uk/global/contact-us/>

## Links to other websites

This privacy Policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## Changes to this privacy Policy

We keep our privacy Policy under regular review. Please ensure you look at it regularly to be aware of any updates. [www.henryling.co.uk/privacy](http://www.henryling.co.uk/privacy)

## How to contact us

You can write to:

The Data Protection Officer  
Henry Ling Limited  
The Dorset Press,  
Dorchester DT1 1HD