Ministry of the Interior: Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Kingley Vale Group Ltd, company registration number 11132352 [VAT number 287709158] and whose registered office is Vale Farm, Chesham HP5 3HW
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual)
Data subject	The individual who the personal data relates to

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Ministry of the Interior: Privacy Policy

Personal data we collect about you:

We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details
- your billing information, transaction and payment card information
- information to check and verify your identity, e.g. your date of birth
- your gender, if you choose to give this to us
- location data, if you choose to give this to us
- your personal or professional interests
- your professional online presence, e.g. LinkedIn profile
- your contact history, purchase history and saved items
- information from accounts you link to us, e.g. Facebook
- information to enable us to undertake credit or other financial checks on you
- Information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions

We collect and use this personal data to provide products and services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing products and to you.

How your personal data is collected

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, eg Companies House or HM Land Registry;
- directly from a third party, eg:
  - credit reference agencies;
  - customer due diligence providers;
- from a third party with your consent,
- from cookies on our website—for more information on our use of cookies, please see our cookie policy https://www.ministryoftheinterior.co.uk/wp-content/uploads/Cookie_Policy.pdf

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How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for you and/or us To comply with our legal and regulatory obligations

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Updating and enhancing customer records	To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or

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- the processing is necessary to establish, exercise or defend legal claims.

Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at *sarah@ministryoftheinterior.co.uk*
- using the 'unsubscribe' link in emails or 'STOP' number in texts.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our products and services to you, e.g. payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our banks;

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

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We may also need to:

- share personal data with external auditors, eg in relation to ISO accreditation and the audit of our accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal data with**').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens, see below: '**Transferring your personal data out of the UK**'.

How long your personal data will be kept

We will keep your personal data while you have an account with us or we are providing products and services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data.

When it is no longer necessary to keep your personal data, we will delete or anonymise it.

Transferring your personal data out of the UK

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK, eg:

- with your and our service providers located outside the UK;
- if you are based outside the UK;
- where there is an international dimension to the services we are providing to you.

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

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- the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law

These are explained below.

Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

- all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
- Gibraltar; and
- Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses.

To obtain a copy of the standard data protection contract clauses and further information about relevant safeguards, please contact us (see '**How to contact us**' below).

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Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, eg:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

Further information

If you would like further information about data transferred outside the UK, please contact us (see '**How to contact us**' below).

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Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- provide enough information to identify yourself and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

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Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any query or concern about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at https://ico.org.uk/make-a-complaint or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 15th June 2021 and last updated on 24th February 2022.

We may change this privacy notice from time to time. When we do we will take appropriate steps to bring those changes to your attention.

How to contact us

Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details
sarah@ministryoftheinterior.co.uk 07917570445

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