

Policy on data protection

The primary purpose of current data protection legislation is to protect individuals against possible misuse of information about them held by others. It is the policy of Revive Vending Limited to ensure that all staff members are aware of the requirements of data protection legislation in relation to their individual responsibilities.

The act covers personal data, whether held on computer or in certain manual files.

We are obliged to abide by the data protection principles embodied in the Act. These principles require that personal data shall:

- be processed lawfully and fairly;
- be held only for specified purposes and not used or disclosed in any way incompatible with those purposes;
- be adequate, relevant and not excessive;
- be accurate and kept up to date;
- not be kept for longer than necessary for the particular purpose;
- be processed in accordance with data subject's rights.

The Act provides individuals with rights in connection with personal data held about them. It provides individuals with the right to access data concerning themselves (subject to the rights of third parties). It also includes the right to seek compensation through the courts for damages and distress suffered by reason of inaccuracy or the unauthorised destruction or wrongful disclosure of data.

Under the terms of the Act, the processing of data includes any activity to do with the data involved. All staff or other individuals who have access to, or who use, personal data, have a responsibility to exercise care in the treatment of that data and to ensure that such information is not disclosed to any unauthorised person. Examples of data include address lists and contact details as well as individual files. Any processing of such information must be done in accordance with the principles outlined above.

In the case of sensitive personal data, which includes information about health, criminal proceedings or convictions, explicit consent will normally be required and will only be requested in respect of employment requirements.

In relation to security, the Data Controller (the company) must take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of or damage to personal data. Staff and other individuals should be aware that guidelines and regulations relating to the security of manual filing systems and the preservation of secure passwords for access to relevant data held on computer should be strictly observed.

Staff should also note that personal data should not normally be provided to parties external to the company. Please see our employment policy for more details.

A failure to comply with the provisions of the Act may render the company, or in certain circumstances the individuals involved, liable to prosecution as well as giving rise to civil liabilities.

How and why we collect and use your personal information

Revive Vending Limited is registered as a data controller with the Information Commissioner's Office. Our registration number is Z6151845. Full details of the registration are available at ICO register of data controllers.

We will process personal data for the following purposes:

- for the purpose to which you provided the information
- to allow us to be able to communicate and provide services appropriate to your needs
- to ensure that we meet our legal requirements
- where you have consented to the processing
- where necessary to protect individuals from harm or injury
- where otherwise permitted under the Data Protection Act 1998, e.g. disclosure to comply with legal obligations

Find out more information on the Data Protection Act from the Information Commissioner.

Using your personal data

In deciding what personal data to collect, hold and use, we are committed to ensuring that we will:

- recognise that any personal data handled by us is held on behalf of that person and that we ensure we respect that responsibility
- adopt and maintain high standards in respect of the handling and use of that personal data
- only collect, hold and use personal data where it is necessary and proportionate to do so
- securely delete any personal data when no longer needed
- keep your personal data secure and safe
- not unnecessarily and without good reason, infringe the privacy of individuals
- consider and address the privacy risks first when planning to use or hold personal information in new ways, such as when introducing new systems
- be open with individuals about how we use their information and who we give it to
- make it easy for individuals to access and correct their personal information
- ensure that there is effective safeguards and systems in place to make sure personal information is kept securely and does not fall into the wrong hands
- provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly
- put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises
- regularly check that we are living up to our promises and report on how we are doing

Where we collect personal information from

We may collect personal information about you or your business from the following sources:

Data you give us

- when you talk to us on the phone or in the office
- when you use our website
- when you email us or send us a letter
- in interviews

Data from third parties we work with

- social networks
- payroll service providers
- public information sources such as Companies House
- loyalty scheme operators

Who we share your personal information with

- HM Revenue & Customers, regulators and other authorities
- organisations that introduce you to us
- companies that we introduce you to
- companies you ask us to share your data with

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations.

Any data collection that is optional would be made clear at the point of collection.

How we use your information to make automated decisions

We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them.

Automated decisions we make

Pricing

We may decide what to charge for some products and services based on what we know

Tailoring products and services

We may place you in groups with similar customers. These are called customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what we learn. This helps us to design products and services for different customer segments, and to manage our relationships with them.

Approving credit

We use a financial institution who will carry out credit checks to decide whether to sell machines on a lease to you.

Your rights

As a person you have rights over automated decisions.

- You can ask that we do not make our decision based on automated score alone.
- You can object to an automated decision and ask that a person reviews it.

Information sharing and disclosure

We will not pass any personal data on to third parties, other than those who either process information on our behalf or because of a legal requirement, and we will only do so, where possible, **after we have ensured that sufficient steps have been taken to protect the personal data by the recipient.**

We will not sell or rent your personally identifiable information to anyone or use the data for any other purpose incompatible with the purpose for which it was originally collected.

We will only send personally identifiable information about you to other companies when we have your consent or have a legal reason to do so. We may also use your information in response to subpoenas, court orders or other legal process. We will only hold your information for as long as necessary for these purposes.

Sending data outside the EEA

We will only send your data outside of the European Economic Area ('EEA') to follow your instructions or to comply with a legal duty.

Email security

Please note, unless encrypted, email messages sent via the internet may not be secure and could be intercepted and read by someone else. Please bear this in mind when deciding whether to include personal or sensitive information in any email you intend to send.

Marketing

We may use your personal information to tell you about relevant products. This is what we mean by 'marketing'

The personal information we have for you is made up of what you tell us, and data we collect when you use our services.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and services may be relevant for you.

We can only use your personal information to send marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

Website

Information collected

On some parts of the website, you may be asked to provide some limited personal information in order to enable the provision of certain services (e.g. contact form). The company may store this information manually or electronically. By supplying this information, you are consenting to the

company holding and using it for the purposes for which it was provided. Information provided will be kept for as long as is necessary to fulfil that purpose.

We may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our webmasters. This is statistical data about our users' browsing actions and patterns which does not identify any individual and allows us to ensure that content from our site is presented in the most effective manner for you and for your computer.

How we store information collected

Information which you provide to us will ordinarily be stored on our secure servers. However, we do work with third party contractors, some of whom host and operate certain features of the website. By submitting personal information, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Google Analytics

We use Google Analytics (GA) to collect statistical data about our visitors and how they use our site so that we can improve our website. The GA cookies collect information in a way that does not form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

We collect this information in a way that does not identify you and the data is not shared with anybody else.

How we use "cookies"

Most of our web pages use "cookies". A cookie is a small file of letters and numbers that we place on your computer or mobile device if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allow us to improve our website.

For more detailed information on the cookies we use on the University's main web pages (i.e. those in www.ox.ac.uk) and the purposes for which we use them, please see our Cookie Statement. Please refer to individual web pages for further information about the use of cookies on other web pages on the ox.ac.uk domain.

Use of photographs and video

Where an image is clearly of an individual or group of individuals, who are the focus of the image, it will be personal data and we will obtain consent in writing to use it.

We will not obtain consent for those who appear incidentally in the background of publicity shots where they are clearly not the focus of the image.

Where an image does not focus on one individual or group of individuals, the data is unlikely to be personal data, but it may not be practicable to obtain the consent of every individual. In these cases, we would ensure that there are clear signs around the venue indicating that publicity photos are being taken.

You may withdraw consent at any point by completing our withdrawal of consent form. However, there may be a short delay while withdrawal is being processed.

For images of children, written consent will be obtained from the child's parent/guardian. Consent can be withdrawn at any point.

Links to other sites

Our website may contain links to enable you to visit other websites of interest easily. Once you have used these links to leave our site, you should note that we do not have any control over external websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. It is recommended that you exercise caution and review the privacy statement applicable to all websites that you visit.

Social Media

We use LinkedIn, Facebook, Twitter and Instagram to manage our social media interactions.

If you send us a private or direct message via social media, it will not be shared with any other organisations and you will be contacted personally.

Recruitment

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Personnel Placements

For senior vacancies, we sometimes advertise through Personnel Placements. Personnel Placements will collect the application information and might ask you to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by recruiters. Information collected by Personnel Placements will be retained for 12 months following the end of our agreement.

Here is a link to their Privacy Notice:

<https://www.personnel-placements.co.uk/privacy-policy/>

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 6 years following the end of your employment. This includes your criminal records declaration, records of any security checks, medical details and references.

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 campaign.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

How we make decisions about recruitment

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account. You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing info@revivevending.com.

Your rights

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-the-public/is-my-information-being-handled-correctly/>

You have a right to be given a copy of your personal data retained by Revive Vending Ltd. If you require a copy of this information, please send a request in writing to info@revivevending.com with Subject Access Request in the subject bar. Alternatively, the request may be in writing clearly identifying the nature of the request to:

1 Scotts Close
Downton Business Centre
Salisbury
Wiltshire
SP5 3RA

All requests must be accompanied by some form of verifiable identification.

If we hold information about you, we will

- give you a description of it
- tell you why and for how long we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form

You have the right to request that we cease processing your personal data. Where possible, we will seek to comply with your request; however, ceasing to process your information may cause delays or hinder our ability to provide services to you. There may be some situations where we will not be able to do this, e.g. where we are required to hold or process information to comply with a legal requirement or obligation.

How long we keep your personal information

We will keep your personal information for as long as you are a customer of Revive Vending Limited.

After you stop being a customer, we may keep your data for up to 7 years for one of these reasons:

- to maintain records according to rules that apply to us
- to respond to any questions or complaints

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

Letting us know if your personal information is incorrect

Although we try to ensure that any personal data we hold about you is correct, there may be situations where the information we hold is no longer accurate. If you find that this is the case, please contact us in writing explaining what you believe is inaccurate and how it should be corrected. Please provide evidence of inaccuracies where available. We will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

You can ask us to restrict the use of your personal information.

If you want to object to how we use your data, or ask us to delete it, or restrict how we use it please contact us in writing.

How to withdraw your consent

You can withdraw your consent at any time in writing.

How to complain

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

Please let us know if you are unhappy with how we have used your personal information. You can contact us at info@revivevending.com.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern.

Changes to this Privacy Notice

Revive Vending Limited will continually review and update this privacy notice to reflect changes in our services and feedback from service users, as well as to comply with changes in the law. We encourage

you to periodically visit our website to review this notice and to be informed of how we are protecting your information.