

Natta Homes Ltd - Privacy Policy

At Natta Homes Ltd we respect the privacy of our supporters and visitors to our website. This policy is concerned with how we collect information, what we do with it and what controls you have.

This policy also explains how we handle your personal information in connection with our websites, social media pages and all our printed and electronic communications.

In this policy references to Natta Homes Ltd or to 'we' or 'us' are to Natta Country Homes Ltd which is a Limited Company located at Rose Court, Rye Common Lane, Crondall, Farnham GU10 5DD.

What information do we collect?

We collect various personal information such as name, postal address, telephone number, email address, date of birth (where appropriate), information about your communication preferences and financial information (e.g. in order to pay you if you are working for us as a subcontractor). For training and employment purposes we may also collect information such as skills, previous training, proof of identity, emergency contacts, right to work and driving license details.

We collect this information only in connection with specific activities, such as newsletter circulation, training programs, when you work for us, ground rentals and calls/visits you may make to us.

The information is either needed to fulfil your request, for contractual reasons or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse our sites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

Natta Homes Ltd also uses cookies. Please refer to our 'Cookie Policy'.

Where we collect your information?

We collect your personal information in a number of ways:

- When you provide it to us directly as part of enquiring about our services
- When we collect it as you use our website
- When you either book or participate in one of our training services
- When you engage with the construction services of Natta Homes Ltd.
- When you work for us, either directly or as a subcontractor
- When you drive a Natta registered/owned vehicle
- For Health & Safety reasons (e.g. insurance claims, accident reports)

We occasionally buy data from third parties that relate to our business. This data relates to corporate and sole trader information. We will only use this data for role related marketing purposes and we will always offer an opt-out.

When we work with third party organisations to process your data in connection with proving your right to work in the UK, training requirements, insurance brokers, driving license checks, occupational health purposes, company vehicle tracking, or distributing newsletters, we enter into

an agreement with them to protect your privacy. These third parties are called data processors who provide elements of our 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 unless we have given our explicit permission to do this. They will hold it securely and retain it for the period we instruct. For more details on how they process your data, you can check their Privacy Policies on their websites. See our list below of who we work with in this way.

CCTV

We operate CCTV and disclose in accordance with the codes of practice issued by the Information Commissioner.

We have installed CCTV systems in some of our premises for the purposes of public and staff safety and crime prevention and detection. CCTV is installed on the outside of some of our buildings for the purposes of monitoring building security and crime prevention and detection. They are also installed in our training building for the purposes of public and staff safety. In all locations, signs are displayed notifying you that CCTV is in operation.

Images captured by CCTV will not be kept for longer than necessary, normally 2 weeks. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the images if requested.

We will only disclose images and audio to other authorised bodies who intend to use it for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

How will we use your personal information?

Personal information collected and processed by us may be used, for the following purposes:

- To update you on our activities and your relationship with Natta Homes Ltd where we have a lawful basis to do so.
- To allow you to participate in interactive features on our website, when you choose to do so, e.g. we may help you complete forms by inserting your contact details for you to edit.
- To analyse and improve the services offered on our websites by providing you with the most user-friendly navigation experience we can for your computer or another internet device.
- To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information.
- To develop our systems and relationships with you.
- To enrol you onto our training services.
- To track Natta registered/owned vehicles.
- When we are legally required to hold certain personal information to fulfil statutory obligations:
 - The collection of Income Tax and transferring of Income Tax/PAYE information to HM Revenue & Customs.
 - Bank details in connection with payments.
 - For insurance reasons and accident reporting.

- To determine you have a valid driving license.
- Validating your right to work in the UK and for occupational health assessments.
- To record driver's activities on Tachographs when using relevant vehicles.
- Administration and archiving including contacting you if we require further information to process your application form.
- Transferring your personal data to organisations we work with to achieve our objectives.
- We will also hold information about your details so that we can respect your preferences for being contacted by us.

Lawful Bases, Consent and Legitimate Interest

We have determined our lawful bases to process your data and this can be accessed by calling on 01252 851158 or sending an email to privacy@natta.co.uk.

Where possible we will endeavour to collect opt-in consent from you, specifically when we employ you or you train with us.

We rarely market direct to the public but we do conduct B2B marketing. In which case we will ensure that the content of our marketing communication is of a relevant interest to your employment role. We may send you information about our campaigning, construction activity, services, products, and other activities.

If we do not hold consent to process your data or contact you, we may use legitimate interest. This enables us, in certain circumstances, to process your data without having your prior consent or any other lawful basis. We have given due consideration to which types of processing fall within the legitimate interests of individuals.

We will always ensure the privacy rights of the individual are given due consideration and any potential harm is identified before processing data in this way via conducting a Legitimate Interest Assessment.

We will never pass on your details to other organisations to use for their own purposes unless it is of interest to you for your employment, training, payment related reasons or is a statutory/contractual requirement.

If at any time you want to alter your preferences or request that we stop communicating with you please let us know by calling us on 01252 851158 or sending an email privacy@natta.co.uk.

Telephone

We will not make marketing or sales calls to you (individual or B2B) if you are registered with the Telephone Preference Service (TPS) unless you have given us consent that you are happy to receive calls from us.

You may still receive other types of telephone calls, for administration purposes from us as long as they are not marketing or sales calls. We do not outsource any telephone calling so you will always be talking to us directly. We do not record or monitor telephone calls.

Who do we share information with?

We will never sell or rent your personal information to other organisations. We only disclose information when obliged to by law, for employment, for purposes of national security, taxation, accident reporting, right to work, vehicle tracking, criminal investigations and the following:

- When we use other companies to provide services on our behalf, e.g. processing, mailing or delivering communications or orders, for employment reasons, training, answering customers’ questions about products or services, sending mail and emails, customer analysis, when using auditors/advisors or processing payments:

MailChimp	Email Provider
Surrey Training Group	Training
Booking Bug	Training
Geason	Training
Pearson	Training
Red Cross	Training
City & European	Accountants
Menzies	Accountants
Mtrak	Vehicle Tracking
Pitstop	Tacograph monitoring
Licensechecker	Driving License Validation
Right To Work	Right to work checks
OH Consultancy	Occupational Health Supplier
Google Forms	Applicant Forms
Amicus	Insurance Brokers
Gallagher	Insurance Brokers
Facebook	Social Media Organisation
LinkedIn	Social Media Organisation
HMRC	Tax/PAYE
Bates	Solicitors
Bell Cornwall	Recruitment
Chartwell Healthcare	Medical Insurance
Databroker	Marketing Data Providers

- If we receive a complaint about any content you have posted or transmitted to or from our website or one of our social media accounts, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of Natta Homes Ltd, our website or our visitors and for other lawful purposes.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.
- We may disclose aggregate statistics about our site visitors, supporters, customers and sales to describe our services and operations to prospective partners, advertisers and other reputable third parties and for other lawful purposes, but these statistics won’t include any personally identifying information.

- If we run an event in partnership with other named organisations (e.g. Charities) your details may need to be shared. We will be very clear what will happen to your data when you register.

Storing your information

Information which you submit to us is sent to computers located within the UK and the European Union Area. This is necessary in order to process the information and to send you the information you have requested.

Information submitted by you may be transferred to/from other reputable third-party organisations as referred to earlier in this policy for processing your details and their computers, to the best of our knowledge, are also situated within the UK and European Union Area (EEA).

This will be done in accordance with guidance issued by the Information Commissioner's Office. We only keep information for as long as we are allowed to in accordance with other legislation or relevant regulations.

If you cease your association with us, any personal information you supply to us will not be retained for longer than necessary and will be removed from our systems or securely disposed of in accordance with the requirements of our Data Protection Policy and our retention periods:

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|--------------|---|
| HR/Staff | - Records required 6 years after leaving unless still valuable |
| Payroll | - HMRC recommends 3 years for PAYE records after income year to which they relate or 3 years after employee leaves, unless still valuable (e.g. insurance reasons), in which case retained for 6 years + 1. |
| Accounts | - HMRC recommends 6 years from the end of the last company financial year they relate to. |
| General Data | - Historic data > 8 years is erased from our systems. |

Children

If you are aged under 16, please ensure you obtain your parent/guardian's consent before sending any personal information to any website or directly to Natta Homes Ltd.

Access to your own information/lodging a complaint

You can contact us anytime to change or update the details we hold or to lodge a complaint at the address below. You can also object to the way we use your data, you can restrict the way we process it and have a right to data portability. You can obtain a copy of your records (this is known as Subject Access Request). We will, of course, ask you to confirm your identity.

If you would like to access your personal data held by Natta Homes Ltd please apply in writing to Data Privacy Lead, Natta Homes Ltd, Rose Court, Rye Common Lane, Crondall, Farnham GU10 5DD, call us on 01252 851158 or send an email to privacy@natta.co.uk.

If you require a full copy of our Data Protection Policy, please use the 'Contact us' link which can be found on our website, to request one.

Other websites

Our website contains hyperlinks to other websites. This Privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Please let us know if a link is not working (use the 'Contact us' link which can be found on our website).

In purchasing goods or services from any of the companies to which any Natta Homes Ltd sites links, you are forming a contract with the company(s) concerned (agreeing to their terms and conditions), not Natta Homes Ltd.

Using our social media pages

While this statement covers our privacy practices and how we will use any information collected from our websites and social media pages, it doesn't cover how providers of social media websites will use your information.

You should read the social media site's privacy policies before adding any content to our social media pages. Make use of the social media site privacy settings and reporting mechanisms to control the way that your information is handled.

Posting content on our websites and social media pages

Remember that the internet provides instant worldwide access. Any information that you provide will be worldwide instantly.

Please don't provide information about yourself or other people unless you're sure you and they are happy to have it made public. In particular, don't provide any information about others without their consent where that information might identify them, such as: -

- Names
- Tagged photos
- Location

Under no circumstances make public other peoples' home address, email addresses or contact numbers.

We welcome positive comments and feedback about our company and services on social media. However, if you have a complaint please use the appropriate channels to Contact Us and we will do our best to resolve any issues in a timely manner.

Security

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control and these are documented in our internal Security Policy and Data Protection Policy. Whilst we can't ensure or guarantee that loss, misuse or alteration of information won't occur, we'll use standard industry methods to prevent this.

Unfortunately, the transmission of information across the internet isn't completely secure and whilst we do our best to try to protect the security of your information we can't ensure or guarantee that loss, misuse or alteration of information won't occur whilst you or we are transferring this information.

This Privacy Policy was updated in April 2018. This statement may change from time to time, for example, if the law around information changes or for operational purposes. We advise you to visit this page regularly to keep up to date with any changes.