



## GDPR PRIVACY POLICY

**Effective Date:** 12/02/2025

**1. INTRODUCTION** National SM (UK) Ltd ("the Company," "we," "our," or "us") is committed to protecting the privacy and security of your personal data. This GDPR Privacy Policy outlines how we collect, process, store, and protect your personal data in compliance with the General Data Protection Regulation (GDPR) and UK data protection laws.

**2. DATA CONTROLLER** National SM (UK) Ltd is the data controller responsible for the processing of personal data under this policy. If you have any questions about how your data is handled, you can contact us at:

**National SM (UK) Ltd**

Registered Office: 5 Concept Court, Kettlestring Lane, Clifton Moor, York, England, YO30 4XF

Email: [office@nationalsmltd.co.uk](mailto:office@nationalsmltd.co.uk)

Phone: 01904 395161

**3. WHAT DATA WE COLLECT** We may collect and process the following categories of personal data:

- **Identity Data:** Name, job title, date of birth, gender.
- **Contact Data:** Address, phone number, email address.
- **Employment Data:** CV, employment history, references, right-to-work documentation.
- **Financial Data:** Bank account details for payroll purposes.
- **Technical Data:** IP addresses, login data, browser type, operating system (if using company IT systems).
- **Usage Data:** Information about how you use our website or services.
- **Communication Data:** Records of correspondence, including emails and calls.

**4. HOW WE COLLECT DATA** We collect personal data in the following ways:

- Directly from individuals (e.g., job applications, contract agreements, emails, phone calls).
- Through our website (cookies, contact forms, analytics tools).
- From third parties (recruitment agencies, background check providers, public sources such as LinkedIn).



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**5. LEGAL BASIS FOR PROCESSING** We process personal data under the following legal bases:

- **Contractual Necessity:** To perform employment contracts, supplier contracts, or service agreements.
- **Legal Obligation:** To comply with UK employment, tax, and regulatory laws.
- **Legitimate Interests:** To protect our business interests, including security, fraud prevention, and improving our services.
- **Consent:** Where applicable, we seek explicit consent before processing data (e.g., marketing communications).

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**6. HOW WE USE YOUR DATA** Your personal data is used for the following purposes:

- Managing employment relationships, payroll, and HR processes.
- Communicating with employees, clients, and subcontractors.
- Complying with legal and regulatory requirements.
- Improving and monitoring our business operations.
- Ensuring IT security and preventing fraud.

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**7. DATA SHARING** We do not sell or rent personal data. However, we may share data with:

- Government authorities (HMRC, legal regulators) when required by law.
- Third-party service providers (payroll processors, IT support, cloud storage providers) under strict confidentiality agreements.
- Legal advisors, insurers, or law enforcement agencies where necessary.

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**8. DATA SECURITY** We implement appropriate technical and organizational measures to ensure data security, including:

- Encryption and secure storage of personal data.
- Access controls to restrict unauthorized personnel.
- Regular security audits and staff training on data protection.

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**9. DATA RETENTION** We retain personal data only as long as necessary for the purposes outlined in this policy, or as required by law. Standard retention periods include:

- Employment records: **6 years after termination.**
- Payroll records: **7 years for tax compliance.**
- Client and supplier contracts: **6 years after contract termination.**
- Marketing data: **Until consent is withdrawn.**



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**10. YOUR RIGHTS UNDER GDPR** Under GDPR, you have the following rights:

- **Right to Access:** Request copies of your personal data.
- **Right to Rectification:** Request corrections to inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of data where legally applicable.
- **Right to Restrict Processing:** Request limited processing in certain circumstances.
- **Right to Data Portability:** Request transfer of your data to another service provider.
- **Right to Object:** Object to processing based on legitimate interests.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw it at any time.

To exercise any of these rights, contact us at [office@nationalsmltd.co.uk](mailto:office@nationalsmltd.co.uk)

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**11. DATA BREACH RESPONSE** In the event of a data breach, we will:

- Assess the risk and impact of the breach.
- Notify affected individuals if required.
- Report significant breaches to the Information Commissioner's Office (ICO) within 72 hours.
- Implement corrective measures to prevent future breaches.

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**12. CHANGES TO THIS POLICY** We may update this policy from time to time to reflect changes in legal requirements or our data practices. Any updates will be posted on our website, and where necessary, we will notify affected individuals.

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**13. CONTACT INFORMATION** For questions regarding this policy or to exercise your rights, please contact:

**Data Protection Officer (DPO)**

National SM (UK) Ltd

Email: [office@nationalsmltd.co.uk](mailto:office@nationalsmltd.co.uk)

Phone: 01904 395161

If you are dissatisfied with our handling of your data, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** at [www.ico.org.uk](http://www.ico.org.uk).

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**14. ACKNOWLEDGEMENT** By interacting with National SM (UK) Ltd, you acknowledge that you have read and understood this GDPR Privacy Policy.

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Ref: P002

National SM (UK) Ltd - GDPR PRIVACY POLICY

**Date of Issue:** 12/02/2025

**Reviewed By:** Data Protection Officer

**Approved By:** Luke Winterburn (Managing Director)

**Next Review Date:** 12/02/2026