

OUR COMMITMENT TO YOUR PRIVACY – OUR PRIVACY POLICY STATEMENT

Introduction

We are committed to protecting your privacy. We will process only personal data that is necessary and proportionate to our purpose.

We've updated our privacy policy and inserted boxes to help highlight privacy topics to make it easier for you to see how and when we use your personal information.

What's new at a glance:

- We've included further details around what we do with your personal information and how you can exercise your privacy rights with NEED Ltd.
- We've given you additional information about retention and when we delete your personal information.
- We've provided increased transparency around the different purposes for which we use your personal information including the legal bases we rely upon.
- We've supplied additional information on how to change your privacy settings and how to contact us regarding data protection matters.

Keeping your personal information safe and increasing transparency are important to us and we're committed to fully comply with these changes. The new GDPR law goes into effect on 25 May 2018 and NEED Ltd. clients will benefit from the added security and privacy protections this law affords.

We do not sell your information and do not pass it on to anyone except those necessary to perform our contractual or legal obligations.

You can view our Privacy Policy at any time via our website or by contacting NEED Ltd. using our contact details on our website at www.needltd.co.uk and at the foot of our emails.

For queries regarding our Privacy Policy contact NEED Ltd. at administration@needltd.co.uk

We are NEED Ltd. Registered Company No. 5817797. Registered Charity No.1120968. VAT registration No. 836452125. Registered address: South Road, Alnwick, Northumberland NE66 2PA. Telephone No. 01665 605 780.

Cookies

Cookies are small files which are placed onto a browser by a website. We do not use cookies on the NEED Ltd. website

The majority of browsers allow you to control cookies through the browser settings. For more information about cookies, including how to see what cookies have been sent and how to manage and delete them, visit www.allaboutcookies.org or to opt out of being tracked by Google Analytics across all websites, visit tools.google.com/dlpage/gaoptout.

Explaining why, when and how we use your personal information

What is personal information?

Personal information is information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Consent

In specific situations, we can collect and process your data with your consent.

For example, for marketing or when you choose to receive electronic newsletters or emails from us we'll use your email address for contact together with your name.

You may unsubscribe from receiving this kind of contact from us at any time by clicking through on the 'unsubscribe' link at the bottom of our newsletter or at the bottom of our emails.

We will hold information for this purpose until you no longer consent to its use.

Contractual Obligation

In certain circumstances, we will need your personal data to carry out and comply with our contractual obligations.

For example, if you've booked transport with us.

We'll need your name, address, email address and telephone number together with passenger names. We will store and use this data until your contract with us ends.

We will retain this information until your contract is terminated and to fulfill our record keeping and tax obligations for a period thereafter not exceeding 6 years.

Legal Obligation

If the law requires us to, we will process and retain your data to ensure compliance.

For example, we may need to process personal information such as name, address, and email contact details for invoicing and payment purposes.

We can also pass on your personal information when reasonably required to do so by a legitimate law enforcement agency or court. We may also be required to supply details to the tax offices governing our business areas.

To fulfill our record keeping and tax obligations, we will retain the information for a maximum of 6 years after collection.

Legitimate Interest

We only process information proportionate and necessary to fulfil our legitimate interests where your rights and freedoms do not outweigh these interests. We have implemented controls to balance our interests with your rights.

For example, if you make an enquiry with us, we will record your name, email address and/or telephone number to enable us to offer our products and services to you at the time of enquiry and in the future. We will follow-up your initial enquiry by contacting you by telephone or email.

You may unsubscribe from receiving emails from us at any time by clicking on the 'unsubscribe' link at the foot of our emails and/or electronic newsletters.

For those with bookings with us, we also process your gender under this arm to assist with room allocation.

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding interest to continue.

In absence of you choosing not to hear from us, we will retain your information for a maximum of 2 years from initial enquiry unless you make further enquiries in which case the 2 years will re-commence and run to duration or your unsubscribe request.

Summary

The lawful bases we rely upon to process your personal information.

1. CONSENT – Direct marketing
2. CONTRACTUAL OBLIGATION – Bookings & employment
3. LEGAL OBLIGATION – Employment, bookings, invoicing & payment processing
4. LEGITIMATE INTEREST – Contact for enquiries past and current, to improve our services (feedback requests), to measure performance of our email marketing and to contact you about Privacy Statements, policy updates or offers or promotions.

How long we keep your personal information

Our retention times vary depending on the use and requirement of the information and we give a general guide to the length of time in this Privacy Policy Statement, our retention periods are influenced by our legal and contractual obligations.

You can rest assured that we will not retain information longer than necessary and will dispose of it in a secure manner according to our data retention and deletion policies.

Who we may transfer information to

We do not sell your information to any third party. We only share your personal information to third parties that are necessary to deliver our contractual and/or legal obligations.

For example, if you book transport through us, we may need to pass on your and contact number to our driver and your destination.

How we protect your data

We know how important security is and we understand our obligations under data protection laws. We treat your information with the utmost care and take all appropriate steps to ensure the safety of your data.

Access to your data is password protected and we have installed a policy and procedure to ensure the safekeeping of data with regular monitoring of our security system and policy.

If you need to complain

We strive to ensure our data protection practices promote your security and our compliance, however if you wish to refer a complaint to a supervisory body you may do so using the details below.

Complaints can be made to the Information Commissioner's Office (ICO) by calling their helpline on 0303 123 1113 (offices open Monday to Friday 9am to 5pm) or by email via their website at <https://ico.org.uk/global/contact-us/email/> or at <https://ico.org.uk/concerns/>

An overview of your rights under GDPR with NEED LTD

The new rules give further rights to ‘data subjects’ (you) and we have summarised them below for you. You can contact us about our Privacy Policy and your data at any time using the contact details on our website, which includes a telephone number, address and email contact.

<ul style="list-style-type: none"> ▪ Right to be informed ▪ Right to access ▪ Right to rectification ▪ Right to erasure (right to be forgotten) ▪ Right to restrict processing ▪ Right to object ▪ Right to withdraw consent ▪ Right to portability 	<ul style="list-style-type: none"> ▪ We have updated our Privacy notice and we send a link to it with each communication ▪ We’ve included details on how to make an access request ▪ We will act on any request to correct inaccurate, incomplete or out of date data ▪ We will erase information subject to request when no other lawful reason exists to retain it ▪ We will restrict use of your data subject to request and only store it for a lawful reason ▪ You can object to processing of your data based on legitimate interests or direct marketing – we have included easy links to stop all such communication from us at the foot of each business email or newsletter ▪ Whenever you have given consent to us to use your personal data you have the right at any time to withdraw it. We’ve included easy unsubscribe links at the foot of our emails and newsletters to make this easier ▪ You have the right to receive a copy of your personal file; and/or have your personal file transmitted from one data controller to another 	<p>To make a subject access request contact our office at administration@needltd.co.uk</p> <p>Please note: We will need to verify your identity before acting on any request made under this Privacy Notice</p> <p>Please contact our data protection clerk at administration@needltd.co.uk or by calling us on 01665 605780 to record your request</p> <p>Please note that you may continue to receive communications from us for a short while until our systems are fully updated with your preferences</p> <p>We will send you your personal file upon reasonable request and subject to security checks. We can only send your file to another controller if technically feasible.</p>
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This Privacy Notice and Third Parties

We will only transfer the personal information necessary to carry out the contractual and legal obligations of our normal business.

By transferring only that data necessary and proportionate to fulfill our contractual and legal obligations to necessary third parties, we ensure that reasonable steps are taken to prevent third parties in any way that's not in line with our Privacy Policy Statement. We'll also make sure that we adequately protect the confidentiality and privacy of your personal data at all times.

We'll seek to ensure as far as reasonably practicable that any third party we transfer your data to only process it in accordance with their legitimate interests and normal business activity.

It's important that we have the correct privacy settings for you, simply click on one of the following links to update your preferences.

To update your privacy settings click [here](#):

To opt in to receiving our newsletters including promotional offers, click [here](#):

To unsubscribe from receiving communication from us, click [here](#):