



## **Privacy Notice For Customers/Clients**

This Privacy Notice is applicable to current and former customers and clients.

It is important that you read and understand the information contained within this Privacy Notice.

Via East Midlands Ltd. (Via) collects and uses the personal data that you provide to us and acts as a Data Controller for your personal data. As a Data Controller, Via is committed to protecting the privacy and security of your personal information. This Privacy Notice will detail what we collect and how we use it, as well as your rights in respect to the personal data we hold about you, as required by the General Data Protection Regulation (GDPR).

Via may also act as a Data Processor for your personal data, should we be contracted by another organisation to process your data as part of the work that we do, for example by Nottinghamshire County Council.

We may update this Privacy Notice from time to time. An up to date copy will always be available from our web page, [www.viaem.co.uk](http://www.viaem.co.uk).

### **Contacting Us About Your Personal Data**

If you need to contact us to discuss the personal data we hold about you, please email [contactus@viaem.co.uk](mailto:contactus@viaem.co.uk) or use the contact details at the bottom of this page.

Via East Midlands Ltd. (Via) is the Data Controller/Data Processor for your personal data. Contact details for Via can be found at the bottom of this page.

Via's Data Protection Officer is Sally Smith, Head of HR, who can be contacted by email at [sally.smith@viaem.co.uk](mailto:sally.smith@viaem.co.uk) or by phone, if your enquiry is urgent, on 07825 022 385.

### **Data Held About You**

The personal data that we hold about you will often have been either provided by you to Via (e.g. in an enquiry you have submitted), or provided by Via to you (e.g. a letter or contract we have sent to you). Some data will also be collected automatically, such as through the use of our systems if you submit enquiries online.

Via may also be provided with your personal data by a third party. Nottinghamshire County Council routinely shares enquiries with us that they receive where those enquiries relate to Nottinghamshire's highway network, so that we can fulfil the contract we hold with them to provide highway services for the county. You may also have appointed a company or contractor to carry out work or make an application on your behalf, who passes your personal data to us as part of that work/application, or be attending training at our Training Centre as part of your employment with another organisation.

We will use your personal data only where we are permitted by law to do so, which includes:

- To perform the contract/agreement that we have with you
- To comply with a legal obligation

[www.viaem.co.uk](http://www.viaem.co.uk)

Tel: 0115 804 2100

Bilsthorpe Depot,  
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Bilsthorpe,  
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- Where it is in Via's legitimate interests, and your interests and rights do not override Via's legitimate interests.

The personal data that we hold for you will depend on the nature of Via's relationship with you. For customers, this could include:

- Identifying information, e.g. your name and title
- Contact details
- Invoices and other payment related information
- Bank details (if we are required to send or receive payments with you)
- Training records (if you were trained at our Training Centre)
- Copies of correspondence
- CCTV footage (if you physically visited one of our sites)
- Technical information about your use of our systems, e.g. system audit history, time stamps etc.

We may also hold special category data about you if you have provided it. This data is held due to Via's legitimate interest in recording the reasons and circumstances around work that has been carried out. The special category data we may hold is:

- Disability or personal health data, e.g. if you are making a request regarding disabled parking that requires evidence of your eligibility, or have informed us of a disability/health issue as it was relevant to your enquiry.

We retain your personal data only for as long as is necessary to fulfil the purpose we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and the applicable legal requirements.

### **Sharing Your Data**

Via shares some of your personal data with 3<sup>rd</sup> party organisations where we are required to by law, where it is necessary in order to administer the contractual relationship we have with you, or where we have a legitimate interest in doing so. The exact nature of the data shared will be dependent on the nature of your interaction with Via, and Via is committed to sharing only the minimum required data. Third parties includes:

- Nottinghamshire County Council
- MPs, County Councillors, District Councillors and other elected representatives
- CORSERV
- IT and systems providers
- Legal service providers, e.g. Via's insurer
- Financial service providers, e.g. a debt collector should we need to make a recovery from you
- Training accreditation bodies, e.g. if you have attended for training with our Training Centre and we are required to inform the accrediting body that you are qualified.

- Other third-party service providers, e.g. our partnered driving instructors if you've signed up for our driving refresher or pre-driver training courses.

Where our relationship with you relates to a specific area of Nottinghamshire, in order to process certain queries we will normally and routinely need to share their content with 3<sup>rd</sup> parties who have a legitimate interest in that area. This will include sharing the personal data you submitted within the query. These 3<sup>rd</sup> parties could include, but are not limited to, the relevant MP, County Councillor, District Councillor and Nottinghamshire County Council.

Your personal data is not transferred to any areas outside of the EU unless absolutely necessary and where Via has taken steps to ensure that the security and data protection measures in place are in line with those in force within the EU. Via does not routinely share customer or client data outside of the EU.

## **Your Rights**

You have various rights in relation to your personal data, which are either always applicable, or applicable under certain circumstances. If you would like to make a request related to one of your rights, then please use the contact details on the first page of this Privacy Notice under "Contacting Us About Your Data". Please note that you may be charged a fee, should your request be excessive.

### **1. The right to be informed**

You have the right to be informed about the collection and use of your personal data. This Privacy Notice is designed to give you all of the information you need to ensure you are informed about the personal data Via holds about you and what it is used for.

### **2. The right of access**

You have the right to access your own personal data that Via holds. This is commonly referred to as a subject access request. You can request confirmation that Via is processing your personal data, a copy of that personal data and certain other information, of which the majority is already contained within this Privacy Notice.

### **3. The right to rectification**

If you believe Via holds personal data about you that is inaccurate, you can request that this be corrected.

### **4. The right to erasure**

This right is also known as the right to be forgotten. Your personal data will be erased in line with Via's retention periods, however you can also request that Via erases some or all of your personal data at any time.

Please note that this right does not automatically apply to all of your personal data, therefore if we are unable to erase some or all of your data, we will notify you of the reasons why when we respond to your request.

## **5. The right to restrict processing**

You can request that Via stops processing your data in a certain way. This right is normally applicable if you believe that the data we hold about you is not accurate, or if you believe that Via is processing your data in an unlawful manner.

It may not be possible for Via to restrict the processing of your personal data completely, therefore if we are unable to restrict the processing of some or all of your data, we will notify you of the reasons why when we respond to your request.

## **6. The right to data portability**

You can request that Via provides you with a copy of your data, or transfers a copy of your data to another Data Controller.

## **7. The right to object**

This right allows you to request that Via stops processing your personal data completely. This right is commonly used to stop marketing communications, however is not limited to that.

It may not be possible for Via to stop processing your personal data completely, therefore if we are unable to stop processing some or all of your data, we will notify you of the reasons why when we respond to your request.

## **8. Right to withdraw consent**

Should you have granted consent for Via to hold or process a specific piece of your personal data, you are able to withdraw that consent.

## **9. Right to raise a complaint**

Via encourages employees to raise any concerns they have with our Data Protection Officer in the first instance, as we would like to try to resolve any concerns you have.

You have the right to raise a complaint to the Information Commissioner's Office (ICO) if you wish to. The ICO is the UK's supervisory body for data protection matters. For more information, please visit <https://ico.org.uk>.