**PRIVACY NOTICE – EVERGREEN BUSINESS SUPPORT LTD**

Evergreen Business Support Limited is committed to ensuring that your privacy is protected and as such we are registered with the Information Commissioner’s Office (ICO). Our registration reference is Z6536164. The Data Controller is Gillian Price. The information you provide is subject to the General Data Protection Regulation. This Privacy Notice confirms how our firm processes your data in a concise, transparent and easily accessible way.

‘Processing’ includes obtaining, recording or holding information or data.

You may be assured that we treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purpose. Steps are taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the data.

Essentially the personal data we process about our clients is to allow us to transact business with our clients and to invoice. The nature of our business dictates that we process data provided by our clients in respect of their clients

**Data Protection Policy**

We do have a Data Protection Policy document, and this is available to you on request.

**Your right to a copy of your personal data**

You are entitled to have access to your personal data held by us. You will not be charged for us supplying you with such data, however we do reserve the right to apply a ‘reasonable fee’ where requests are deemed excessive. We will respond to your request as soon as possible and within the maximum time frame of one month.

We can refuse requests that are manifestly unfounded or excessive, in this case we would tell you why and you will then have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest within one month of our notification to you.

**Data Processing**

We will ensure that we are accountable and are able to demonstrate that data processing only occurs within the following principles:

1. Data will be lawfully and fairly processed in a transparent manner.
2. Data is collected on the grounds of explicit and legitimate purposes only.
3. We will only ask for data when necessary, explain if data will be shared and how long it will be kept.
4. Data will be accurate, kept up to date and erased without delay should your data no longer be required for the purpose to be processed.
5. Data will only be retained for as long as necessary.
6. Data will be secure.

**Rights of the client**

The points below clearly set out the rights each client is entitled to. Please ask us for an explanation of each should you wish to have more information.

1. The right to be informed.
2. The rights of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. Rights to object.
8. Rights not to be subject to automated decision making including profiling.

**Right to complain**

In the event you believe your data has been wrongly processed, stored or handled you have the right to raise a concern with the Information Commissioners Office (ICO). Details on how to do this can be found on:

<https://ico.org.uk/for-the-public/raising-concern>

**Lawful basis for processing personal data**

To enable us to process personal data we must have a ‘lawful basis’ as well as a purpose for processing. Processing data is necessary to achieve our purpose and as such we have a lawful basis. To enable us to process your personal data we must seek your consent.

Essentially the personal data we process about our clients is to allow us to transact business and to invoice. This data is used for the sole purpose of understanding client needs and to provide a fast, efficient and accurate transcription service. To enable us to establish needs we collect client name, e-mail address, telephone number, website and contact details. We add this data to our customer base and use this information for invoicing purposes and, if necessary, would provide to solicitors and/or other debt collection agencies for debt collection purposes if needed.

**Lawful basis for processing our client’s client data**

We obtain sufficient data for us to transact business with our clients, however additionally, the nature of our business dictates that we process data provided by our client in respect of their clients (for example, the production of documents which contain our client’s client/patient/member details). Therefore, we process personal and sensitive data about our clients’ clients. We deal with this data in accordance with GDPR and our Data Protection Policy.

Employees of Evergreen Business Support Ltd who require such access do have access to client information (and to client’s client/patient/member information), this is vital due to the provision of services, and all staff are fully aware of privacy issues.

**Data Breaches:**

If, as a firm, we breach our procedures we will report certain types of data breaches to the Information Commissioners Office (ICO) and in some cases to individuals. Where such a breach is likely to result in a high risk and freedom of individuals we will notify those concerned directly in most cases. We have strict procedures in place to detect, report and investigate breaches.

The paragraphs below explain the firm’s stance on **CLIENT CONSENT** and **COMMUNCIATIONS AND MARKETING.**

**Communications and Marketing Preferences**

Occasionally, we may send you marketing/promotional communications via email, telephone or post. Recipients will be carefully selected, and information will only be sent where we feel it to be appropriate. Any such communications will include the option to opt out.