

# W & D McCulloch Ltd - Privacy Notice

This Privacy Notice provides details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with.

## Our Contact Information (Data Controller)

W & D McCulloch Ltd  
Craigiemains, Main Street  
Ballantrae  
KA26 0NB  
United Kingdom  
Telephone: +441563258404  
Company Email: admin@mccullochgroup.com

## What we do with your personal data

We process personal data only for the purpose for which they are collected. The purpose is dependent on whether you use only our website, or additionally, our services. If you use our services you are required to register and we collect your personal data. We use this personal data for the provision of the service or the performance of the contract. We may use your personal data for other similar purposes, including marketing and communications, but that will only occur in the case we have your consent or another legal justification for doing so.

From our **Customers and Clients** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Customer analysis	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Contact management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Customer support	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Administrative enquiries	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Budget management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Business operations and due diligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Communications, marketing and intelligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Debt management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires
Product development and enhancement	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Sales and Distribution of Products and Services	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Service delivery	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn

Site management and security	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
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From our **Consultants** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

<b>Processing purpose</b>	<b>Legal basis</b>	<b>Retention period</b>
Employee monitoring	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires
Employee performance management	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires
Employee Recruitment and Employment	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires

From our **Suppliers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

<b>Processing purpose</b>	<b>Legal basis</b>	<b>Retention period</b>
Budget management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Business operations and due diligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Industry specific regulation, standards and intelligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires
Organisation's administration and management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Product development and enhancement	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Service delivery	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Site management and security	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Supplier Management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn

From our **Prospects and leads** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

<b>Processing purpose</b>	<b>Legal basis</b>	<b>Retention period</b>
Business operations and due diligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Communications, marketing and intelligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn
Contact management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until consent withdrawn

## What personal data do we collect?

The personal data we collect depends on whether you just visit our website or use our services. If you visit our website, you do not need to provide us with any personal data. However, your browser transmits some data automatically, such as the date and time of retrieval of one of our web pages, your browser type and settings, your operating system, the last web page you visited, the data transmitted and the access status, and your IP address.

If you use our services, personal data is required to fulfill the requirements of a contractual or service relationship, which may exist between you and our organisation.

We collect:

- Banking Details
- Employment History
- Identification Number
- Photographs together with Identifiers
- Visual Images
- Digital Images
- Education History
- Employee Performance Data
- Financial Details
- Location Information
- Name
- Telephone contact details
- Confidential Correspondence
- Credit History
- Email, Social Networks

We collect special category personal data and do so under the following legal basis:

- Health
  - 9(2)(b) - For employment, social security or social protection law
- Racial or Ethnic Origin
  - 9(2)(b) - For employment, social security or social protection law
- Special Educational Needs
  - 9(2)(b) - For employment, social security or social protection law

## How do we look after personal data?

We limit the amount of personal data collected only to what is fit for the purpose, as described above. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal data only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal data for historical or statistical purposes we ensure that the personal data cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data.

## How can you access your personal data?

You have the right to request access to any of your personal data we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

**If you would like to make a request to see what personal data of yours we might hold, you may make a request from our company website.**

Where you have previously given your consent to process your personal data, you also have the right to request that we port or transfer your personal data to a different service provider or to yourself, if you so wish.

Where it may have been necessary to get your consent to use your personal data, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal data without affecting the lawfulness of processing based on consent before your withdrawal.

## Information Commissioner

You have the right to lodge a complaint with the Information Commissioner. See contact details below.

Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
United Kingdom  
[casework@ico.org.uk](mailto:casework@ico.org.uk)  
+44 303 123 3113  
[www.ico.org.uk](http://www.ico.org.uk)