

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Stephen Roberts (Auctioneer) Ltd. is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Watton Salerooms, Unit 10 Breckland Business Park, Norwich Road, Watton, Norfolk IP25 6UP Tel: 01953 885676, email enquiries@thesalerooms.co.uk. For all data matters contact Barbara Roberts (Director) on 01953 885676 or email administrator@thesalerooms.co.uk.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To create itemised sale statements for vendors.

To create invoices for purchasers.

To prepare valuations and invoices relating to services for clients.

To maintain our own accounts and records.

To monitor and maintain the security of premises and goods that are left in our care and the safety of people visiting the Salerooms using CCTV.

You may give us information about you by registering as a seller, buyer, supplier or client, by completing a bidding form, or by corresponding with us by phone, email, in writing, using social media or otherwise.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data: Name, address, telephone number, email address.
- Debit or Credit Card data (for cardholder not present transactions given verbally by telephone only and not retained)
- Bank Account number and Sort Code for BACS payments.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Consent of the data subject;	When providing bank or payment card details.
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	When entering goods for sale by auction you are contracting us to sell them on your behalf. When completing a bidding-form you are contracting us to bid on your behalf. When registering to bid, you are entering into a contract under which you agree to pay for any items that you bid on, should your bid be the highest at the fall of the hammer.
Processing necessary for compliance with a legal obligation	For the purposes of preparing our own accounts and for the purposes of making returns to Government or other agencies we have a legal obligation to report to or share information with.
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	To monitor and maintain the security of premises and goods that are left in our care and the safety of people visiting the Salerooms using CCTV.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with our employees for the purposes of preparing Auction records and accounts, our accountants, and Government or other agencies we have a legal obligation to report to or share information with.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. For a period of 7 years after the end of the fiscal year if your data forms part of our own accounts as required by HMRC. Our CCTV footage is overwritten after 14 days unless we are legally required to provide footage to the Police or evidence is required for any issue such as in the case of any legal or insurance claims or complaints.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract as a client, vendor or as a buyer unless you choose to pay cash to the porter or auctioneer immediately after the fall of the hammer. Purchasers of air weapons and vehicles must provide full contact details as we are legally required to record these by the relevant licensing authorities.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

11. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer, Barbara Roberts on 01953 885676.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email

<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.