

NORTHERN ARCHAEOLOGICAL ASSOCIATES

COMMERCIAL PRIVACY POLICY

1) Introduction

In the following document the terms 'we', 'our', 'company', and 'NAA' refer to Northern Archaeological Associates Ltd.

General data protection regulation (GDPR) distinguishes between the *controller* (responsible for determining the purposes and means of processing personal data) and *processor* (responsible for processing personal data on behalf of a controller).

As part of NAA's operations, the company can both act as a controller and processor of personal data. GDPR requires that the processor of information must maintain records of retained personal data and justify the necessity of completing processing activities.

The company's Data Protection Officer is Damien Handslip (dh@naaheritage.com), who will monitor GDPR compliance within the organisation, and advise the organisation of their obligations. If you have any concerns or need further information, please contact the Data Protection Officer.

2) Justification for retention

NAA respects your personal information, and instates appropriate policy to comply with all applicable data protection legislation currently in force.

NAA may process personal information provided by you on the basis of the following:

1. **Contract:** the processing is necessary for a contract we have with you
2. **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations)
3. **Vital interests:** the processing is necessary to protect someone's life
4. **Public task:** the processing is necessary for us to perform a task in the public interest or for official functions, and the task or function has a clear basis in law

5. **Legitimate interests:** the processing is necessary for our or your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests
6. **Consent:** you opted into or subscribed to a mailing list or database

3) Personal information we collect

Depending on how we acquired your personal information, and the necessity of processing we may collect the following:

- Name and job title
- Contact information including email and postal address
- Financial information (as required as part of contracted work)
- Information acquired as part of the requirements of a specific job
- Information acquired through surveys aimed at improving our services
- Online identifiers (i.e. mobile device IDs and IP address)
- Location data

4) How we process personal data

In order to fulfil the delivery of contracted works, personal data will be processed as required by contractual and legal obligations, and legitimate interest. Personal information may be processed in numerous repositories (i.e. databases, emails, etc.) for the duration of a commissioned project, and retained for a required period after the work's completion. If you have opted in to a database or mailing list, and are involved in commissioned works your personal information may be processed in numerous databases with varying justifications for retention.

In order to improve our services NAA may occasionally complete audits and surveys. Personal information may be acquired through these assessments and processed for the individual's legitimate interest, unless the need to protect an individual's personal data overrides that of their legitimate interest.

NAA hold numerous opt-in databases and mailing lists. These store supplied information (including name, company name and email address, and telephone number), and are used to

occasionally contact individuals regarding information appropriate to the database they have subscribed to.

If at any point we feel an individual would benefit by being added to a mailing list(s) or database(s) held by NAA with an alternative function to the primary purpose for data processing, we will first seek your permission and detail the scope of the specified database(s).

To ensure the information we store is correct we will regularly review our databases. If at any point we change how your data is stored we will notify you. This may require your consent or for you to check any personal information that we store.

5) Ways you can control or access your personal data

Where processing is based upon consent, you have the right to withdraw consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal. An opt-out or unsubscribe option will be made available in any received communication between you and NAA, or alternatively you can email us directly at info@naaheritage.com. If you choose to opt-out at any point we will aim to quickly and fully remove your personal information from our systems.

In accordance with the company's data protection policy, you are entitled to request a copy of your personal information that the company stores. If you become aware that the personal information the company holds is inaccurate, you may request that it is amended. Any requests in this respect or any other correspondence relating to this notice should be done in accordance with the company's data protection policy.

You also have the right to request that your data is made portable to another repository. NAA will ensure an easy data portability, unless the request is deemed manifestly unfounded or excessive. In this instance a reasonable fee may be requested, or the request refused to be dealt with.

You retain the right to request your data is erased, that processing is restricted or object to us processing your data. NAA will investigate all requests or objections, and will act as deemed reasonable and fair with consideration to both the individuals and companies interests.

6) How we share your personal information

Any information you supply us with will be primarily used by NAA, whose operations are located within the European Economic Area (EEA).

Personal data may be required by our affiliates, contractors and agents.

If a third party requests personal information stored by NAA, the company will not disclose your personal information without your permission unless such disclosure is required by law, or other court order.

Although NAA's selection process favours third parties that are meticulous in complying with GDPR laws, and use appropriate measures to process disseminated personal information, NAA takes no responsibility for any subsequent processing undertaken by a third party.

If NAA has acquired your personal information from third parties we would notify you before incorporating your personal information into our existing data bases. Depending on the reason for processing, this may require your consent, and for you to check the accuracy of any personal information that we store.

7) How we protect your personal information

NAA takes every precaution to protect the personal information that we store through appropriate legal, organisational and technical measures.

We maintain and regularly update our internal data mapping to ensure the data we store is accurate, up-to-date, and reasonable. Digital data stored internally on NAA's servers and information collected on external websites (such as mailing list or procurement websites) is protected with secure passwords. NAA's environmental policy highlights NAA's commitment to avoiding unnecessary waste and recommends that paper or hard copies of information is only created when essential. Where hard copies are made, they are kept in a secure location and are appropriately disposed of once the reason for retention has exceeded.

8) Personal information acquired through our website

Our website uses both Lead Forensics and Google Analytics tracking software to record the interaction of visitors with our websites. These technologies create a comprehensive record of visits to our website recording details such as:

- individual's company name
- IP address
- how they accessed our website (i.e. search engine, direct hit or social media link)
- when they accessed our website

- time spent on website
- the pages visited
- the domain name of search engine used

We may use data gathered from these websites to inform marketing campaigns, and as a means to access if a company, or individual within it has a legitimate interest in the products or services we offer.

Our website occasionally provides links to external websites that are not maintained by NAA. These websites are not governed by any of NAA's privacy policies. Consequently, NAA does not take responsibility for any personal information processed when visiting these websites and advises you carefully read the privacy policy of the website(s) you are visiting.

9) Updates to Privacy Policy

NAA retains the right to update our Privacy Policies as required.

If substantial or material changes are made we may directly contact you, or place a notice on our website to ensure that you are kept informed of our policies, and how they may affect your interaction with us.