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Privacy Policy & Notice GDPR

Recommendation

Directors are requested to read this policy, consider its content, and approve its adoption. This policy should be reviewed by HR annually.

Author's Role	HR Manager
Date of Last Review	01/12/25
Next Review Date	01/12/26

Privacy Notice:

Millgate Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, www.millgate.co.uk (Our Site) and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice & Policy carefully and ensure that you understand it. Your acceptance of this Privacy Notice & Policy is deemed to occur upon your first use of Our Site, and you will be required to read and accept this Privacy Notice & its Policy when signing up for an Account with Millgate. If you do not accept and Privacy Policy, you must stop using Our Site immediately.

Who are we?

Millgate Limited is a provider of IT products and services to commercial, industry, and public- sector clients among others. We work with numerous suppliers, partners and contractors to provide such services to a geographically and organisationally diverse client base.

Privacy Policy:

1. Definitions and Interpretation


In this Policy the following terms shall have the following meanings:

“Account” means an account required to access and/or use certain areas and features of Our Site; **“Cookie”** means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 15, below; and

“Cookie Law” means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

“We/Us/Our” means Millgate Ltd, a limited company registered in England, company number 03229619, whose registered address and main trading address is Units 3 & 7 Vantage Drive, Tinsley, Sheffield, S9 1RG;

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2. Information About Us

company number 03229619.

Data Protection Officer: Stacey Clarke

Email address: stacey.clarke@millgate.co.uk

Telephone number: 0114 242 7310

Postal Address: Unit 7, Vantage Drive, Tinsley, Sheffield, S9 1RG

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.


Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in section 15.
- The right to access the personal data we hold about you. Section 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in section 15 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in section 15 to find out more.
- The right to restriction of processing (i.e. prevent) restrict the processing of your personal data.
- The right to object to us using your personal data for certain types of processing such as direct marketing.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

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- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- i) Right to judicial review

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in section 16.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau section 14.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. What data do we collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non- personal data (please also see section 15 on our use of Cookies).

Name;
Email address;
Telephone number;
Business name;

Personal data type:	Source (where Millgate Limited obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Business contact details; Names, Job titles, Email address, Phone numbers (landline/mobile), Shipping address	Indirect: LinkedIn, customer websites, public directories. Direct: Telephone prospecting, networking events
Incidental information; Annual leave, birthdays, social events, opinions	Directly from customer or informed customer employee/colleague.
Credit/debit details, bank details	Directly from customer

The personal data we collect will be used for the following purposes:


Facilitating business transactions
Delivery of purchased goods
Marketing and promotion of our goods and services
General customer service/relationship management

Our legal basis for processing for the personal data:

Contractual obligation
Legal obligation
Legitimate business interest

Any legitimate interests pursued by Millgate Limited are as follows:

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- Business development (lead generation, relationship management)
- To improve our service offering
- Marketing purposes

The special categories of personal data concerned are:

- We do not collect any special categories of personal data of any kind.

1. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site.
- Personalising and tailoring your experience on Our Site;
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or other means that you have opted-in to; you may unsubscribe or opt-out at any time by following the unsubscribe links at the bottom of any marketing emails received from Millgate Limited.
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.

With your permission and where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or other means with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.


Third Parties including (including but not limited to Google, Bing and Reviews.co.uk) whose content appears on Our Site may use third-party Cookies, as detailed below in section 15. Please refer to section 15 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

1. Retention Period; How Long Will You Keep My Personal Data?

Millgate will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We keep information while you're our customer and after you've left us. We use your information to provide you with the products and services you have selected and for a variety of other reasons. In each case, the length of time that we need to keep the information may be different, but we will only keep the information for as long as we need it.

Millgate Limited will process customers personal data for as long as they are a valid or potential customer. Millgate will store the personal data for this period, unless there is a legitimate, contractual or legal obligation that would require us to remove personal data.

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Type	Customer	Prospective customer
Definition	A business who has transacted with us for the provision of goods or services.	A business who's contact details we have legitimately gained through sources defined in table 2.1 and who we would like to transact with.
Retention period	Contact information: Between 2 years – indefinitely (until request for the data to be removed) Financial information: 7 years minimum	Contact information: We only retain data relating to a business, this is held indefinitely. A contact from a prospective business can request to be removed.

2. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

3. Disclosure; Do You Share My Personal Data?


Millgate Limited will pass on your personal data to third parties. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities.

Third party	Processing activities
Distribution partners	Facilitating business transactions
Logistics	Delivery of purchased goods
HMRC	Legal obligation
Auditors	Legal obligation
Legal representatives	Legal obligation
Support partners	Delivery of purchased goods/service
Mail Chimp	Marketing and promotion of our goods and services
Millgate Connect	Facilitating business transactions

1. How Can I Control My Personal Data?

- 1.1 In addition to your rights under the GDPR, set out in section 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and, at the point of providing your details and by managing your Account).
- 1.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

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2. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see section 15.

3. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.


We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

1. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Millgate Limited (or third parties as described in section 5. above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Millgate Limited. The details for each of these contacts are:

	Supervisory authority contact details	Data controller contact details
Contact Name:	Information Commissioners office (ICO)	Millgate Limited
Address line 1:	Information Commissioners Office	7 Vantage Drive
Address line 2:	Wycliffe House	Tinsley
Address line 3:	Water Lane	Sheffield
Address line 4:	Wilmslow	S9 1RG
Address line 5:	Cheshire	South Yorkshire
Email:	casework@ico.org.uk	info@millgate.co.uk
Telephone:	0303 123 1113	0114 242 7310

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2. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies may be used on Our Site to help us measure how users interact with Our website content. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

2. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Stacey Clarke):

Email address: info@millgate.co.uk


Telephone number: 0114 242 7310

Postal Address: Unit 7, Vantage Drive, Tinsley, Sheffield S9 1RG

3. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

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Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date



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