



Matthews Commercial Services  
**t/a Matthews Confidential Shredding**  
Unit 1, Old Crown House  
Gorseinon Road  
Swansea  
SA4 9GE

## GDPR – Data Privacy Notice

### Introduction

Matthews Commercial Services Ltd. ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

### 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?

MATTHEWS COMMERCIAL SERVICES LTD. is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are 01792 897271 [enquiries@mcswales.com](mailto:enquiries@mcswales.com) .For all data matters, contact the Data Processing team on 01792 897271.

Telephone: 01792 897271  
Email: [enquiries@mcswales.com](mailto:enquiries@mcswales.com)



Company Number: 03453295  
VAT Reg Number: 701 0073 08

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

We use your personal data for the following purposes:

- To register you as a new customer
- To process your order
- To provide a quotation
- Deliver our Services
- 1. Manage payments, fees & charges
- 2. Collect and recover money owed to us
- To administer and protect our business and this website (including data analysis, system maintenance, reporting and hosting of data, and troubleshooting)
- To use data analytics to improve our products/services, website and marketing
- To make suggestions and recommendations to you about products or services that may be of interest to you

### 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 including – Name, identity, contact, photograph, vehicle registration, financial, transaction, marketing & communications, technical, usage and profile.
- Special categories of data - We do not process Special categories of personal data.

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

Purpose	Data Type	Legal Basis for processing
Register as a new customer	Name, Identity, Contact, driving License (Photograph)	Performance of a contract with you Legal Obligation
Processing Order including delivering our services, managing payments, fees & charges, collecting and recovery of monies.	Name, Identity, Contact, Financial, Transaction, Marketing, Communications	Performance of a contract with you. Debt Recovery (Legitimate interest) Legal Obligation
Administer and protect our business and this website (including data analysis, system maintenance, reporting and hosting of data, and troubleshooting)	Name, Identity, Contact, Technical	Legitimate Interest and Legal Obligations. (Running our business, administration, IT services and marketing strategies')
Data analytics to improve our products/services, website and marketing	Usage Technical	Legitimate interest, Customer type, develops our business and to inform marketing strategy.
Suggestions and recommendations to you about products or services that may be of interest to you	Name, Identity, Contact, Profile, Marketing, Communications	Legitimate interest, to grow our business and develop our services.

### 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with:

- Service Providers who provide IT and system administration services for us
- Professional advisors, including lawyers, bankers, auditors, accountants and insurers who provide consultancy services.
- HMRC, regulators and other authorities.
- On rare occasions, we may have to share your data with a third party for the purposes of transport etc. We require all third parties to respect your security of your personal data and treat it in accordance with the law. We do not allow third parties to use your data for their own purposes.

## 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the purposes we originally collected it for, please see our Retention Policy for all criteria's and proposed destruction periods.

## 8. Providing us with your personal data

We require your personal data, as it is a requirement necessary to enter into a contract, you are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will have the following consequences:

1. We may be unable to provide a full and accurate quotation, which may then lead to difficulties in entering into a contract between both parties.

## 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 your 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. 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 Processing Team on 01792 897271

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.