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# DATA PROTECTION POLICY

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Issue: 2.0

24<sup>th</sup> February 2025

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## Issue Record

Issue / Revision	Incorporated by	Revision date	Affected pages	Comments
1.0	Nathan Kennedy	6 <sup>th</sup> June 2023	All	First issue
2.0	Nathan Kennedy	24 <sup>th</sup> February 2025	All	Complete revision

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### 1. **Introduction:**

John Pipe International have over 60 years experience delivering bespoke manufacturing of export packing as well as local, national and international freight solutions. We are MPAS and ISO 9001 accredited and also hold the appropriate qualifications for the packing and shipping of hazardous goods according to the relevant regulations. The Company offers packing solutions at both Customer premises and within our own warehouse facilities in Poole and Eastleigh. In addition to this, we also offer warehouse storage solutions at these facilities.

### 2. **Scope:**

The goal of the data protection policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of commissioned processing. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) and Data protection Act (DPA) 2018 but also to provide proof of compliance.

### 3. **Priorities:**

Personal data privacy is important to us.

The Company needs to process personal data in order to deliver our services to our Customers and our Employees.

We are committed to treating the information that we hold securely, with respect and in line with data protection law.

The Company leadership team regularly review this statement and this policy and the latest update is available within our Company intranet.

### 4. **What information is collected and how is it used?**

The Company will only collect personal information when we need it. The type of information we need from you will relate to our need to communicate with you regarding operational functionality. When we ask you for information, we will make it clear why we need it.

As a **Customer**, we will need your personal contact details, as well your company details. The information that the Company collects from our Customers (both current and prospective) will be used to contact you for operational, financial and sales reasons only.

As an **Employee**, we will need a greater level of personal contact details, including your name, home address, telephone numbers (including mobile), emergency contact details, relevant medical history, relevant criminal history, driving licence details, details of any pertinent qualifications that you may hold, National Insurance and PAYE tax details, Immigration Status and your Right to Work in the UK.

The information that the Company collects from our Employees will be used to ensure that the Company is able to:

- Remain compliant to other relevant legislations.
- Contact the employee by telephone and in writing.
- Conduct its operations safely and legally.
- Carry out such employment-related investigations as may be required.
- Determine relevant training requirements.
- Contact the nominated Emergency Contact in the event of mishap or tragedy.
- Secure the services of third parties on company business at an appropriate level.

## **5. How will we protect the information about you?**

The Company will apply appropriate technical and organisational measures to ensure your personal information is secure. For example, we have systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.

If the Company should need to share personal data with our contractors and third party suppliers, our relationships are governed by our contracts with them which include strict data sharing and confidentiality protocols.

To help us ensure confidentiality of your personal information we may ask you (and any of your representatives) to confirm your identity when you call us and as may be necessary when we call you.

We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you (as a one-off circumstance).

## **6. Who will we share your information with?**

**We never share personal information with any other organisation for third-party marketing purposes.**

We may also share information when required by law, for example, where ordered by the Court or to protect an individual from immediate harm.

What are your rights in relation to your data?

We are committed to upholding your rights in respect of your personal data.

**The right to be informed:** through the provision of this and other such privacy notices as may exist, we will be open and transparent about how and why we use your personal information.

**The right of access:** you have a right to ask us what personal information we hold about you and to request a copy of your information. This is known as a 'subject access request' (SAR). SARs need to be made in writing and we ask that your written request is accompanied by proof of your address and identity.

If you are seeking to obtain specific information (e.g. about a particular matter or from a particular time period), it helps if you clarify the details of what you would like to receive in your written request.

If someone is requesting information on your behalf they will need written confirmation from you to evidence your consent for us to release this and proof of ID (both yours and theirs).

We have 30 calendar days within which to provide you with the information you've asked for (although we will try to provide this to you as promptly as possible).

**The right to rectification:** you can ask us to rectify your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by keeping us informed if your details change.

**The right to erasure:** the right to erasure is also known as ‘the right to be forgotten’. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data.

**The right to object:** you can tell us you object to us processing your data. We request that any such objection is made in writing with clear reasons as to why the objection has been raised.

## 7. How long will you keep my data?

We only hold records during the period of our relationship and for a set period afterwards to allow us to meet our legal and contractual obligations, including resolving any follow up issues between us.

For our **Customers**, we have processes in place to our remove email addresses that are unresponsive or exhibit delivery problems.



Nathan Kennedy  
Managing Director

Company Registered Address

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Company Registered No. 00710494

Approval to BS EN ISO 9001:2015 by N Q A & MoD MPAS Military Packaging Accreditation Scheme

All transactions handled by us are subject to the Standard Trading Conditions of the British International Freight Association (current edition)