

GENERAL DATA PROTECTION POLICY

In accordance with the General Data Protection Regulation (GDPR) we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for, and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles we will ensure that:

- a) processing is fair, lawful, and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant, and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data in order to carry out effective and efficient processes. We hold the data within our computer systems.

Specifically, we hold the following types of data, as appropriate to your status:

- a) personal details such as name, company, address, phone numbers
- b) information relating to your position, including: job title

C) COLLECTING YOUR DATA

In some cases, we will collect data about you from third parties, such as websites, other agencies.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Maintaining comprehensive up to date records about you to ensure, amongst other things, effective correspondence can be achieved and maintained	Our legitimate interests
Preventing fraud	Our legitimate interests

Ensuring our administrative and IT systems are secure and robust against unauthorised access

Our legitimate interests

E) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for marketing, administration, and the carrying out of performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons, to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

F) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction, and abuse. We have implemented processes to guard against such.

G) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

H) CONSENT

Where you have provided consent to the use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

I) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

J) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Peninsula Business Services Limited

0844 8922 773