

PRIVACY NOTICE & DATA RETENTION POLICY FOR CUSTOMERS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our customers, 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.

This notice applies to current and former customers.

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 on our customers in order to carry out effective and efficient processes. We keep this data in a customer file relating to each customer and we also hold the data within our computer systems, for example, our customer database and accounting systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers, fax number, email address
- b) bank account details (Sort code, Account, Branch, Bank Address)
- c) trade association membership details
- d) network IP structure and details
- e) user logon and password details

C) COLLECTING YOUR DATA

Your data may be collected via several channels.

- a) Directly from you
- b) Via one of our existing customers
- c) Via a professional body that you would normally be a member of
- d) Via a business partner that we work along side

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 or in order to effectively manage the software/hardware contract you have with us.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the support of your software/hardware systems	Performance of the contract
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Implementing grievance procedures	Our legitimate interests
Assessing training needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

We do not store any special categories relating to your data.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a support contract with you. This could include being unable to offer you a support contract, or administer contractual benefits. This may also affect our ability to resolve software/hardware support issues.

G) CRIMINAL CONVICTION DATA

We do not collect/store criminal conviction data.

H) WHO WE SHARE YOUR DATA WITH

The only time your data will be shared with third parties outside BHL is for either 3rd party software support where BHL is unable to resolve the problem in-house. Also basic data will be passed to 3rd party shipping companies for delivery of goods to our customers. All employees with such responsibility have been trained in ensuring data is processed 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.

I) 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.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your contract. The customer file is retained for 3 years from termination of contract unless we are instructed by the customer to destroy this immediately upon termination.

K) AUTOMATED DECISION MAKING

We do not employ automated decision making.

L) CUSTOMER RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests”;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on customer rights under GDPR.

M) CONSENT

Where you have provided consent to our 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.

N) 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.

O) DATA PROTECTION COMPLIANCE

Our appointed compliance officers in respect of our data protection activities are:

(Name): Mark Capewell

(Contact Details): mark@barcellos.co.uk – 0116 268 2488

(Name): Deborah Clark

(Contact Details): debbie@barcellos.co.uk – 0116 268 2488

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