

## General Data Protection Regulation

We are Specialized Security Products Limited, Units 20-21 Park Farm Industrial Estate, Ermine Street, Buntingford, Herts, SG9 9AZ.

Due to the size of our company, we do not have a specified Data Protection Officer responsible for the Data Protection Act, the General Data Protection Regulation, or the Privacy and Electronic Communication Regulation. However, if you wish to discuss any of this legislation with us, please contact the office on 01763 274223 and ask for Sam Abbey, Finance and Operations Manager, or email [sam@specialized-security.co.uk](mailto:sam@specialized-security.co.uk) and a response will be provided to you.

The General Data Protection Regulation (GDPR), which goes into effect on 25 May 2018, creates consistent data protection rules across Europe. It applies to all companies that process personal data about individuals in the EU, regardless of where the company is based. Processing is defined broadly and refers to anything related to personal data, including how a company handles and manages data, such as collecting, storing, using and destroying data.

The following document gives the information you are entitled to know under the GDPR.

### **Who's data do we collect:**

We collect data from the following groups of people:

- People who visit our website (Consumers)
- People who buy from us (Customers), have bought from us in the past, or are considering buying from us, have asked us to quote for goods, or have downloaded our catalogue
- People who sell to us (Suppliers) or have sold to us in the past.

We also collect data/information from people who work for us (Employees) or have worked for us, or have applied for a job with us. This data is covered by the Internal GDPR Policy which is available to employees, but is not intended for public consumption and therefore is not published as part of this document.

### **Where do we get this information from:**

We normally collect all data directly from you, or your representative within the organisation that you represent. This may be from you verbally, by email, or via our website.

If you are a private individual, you will have provided us your information directly either verbally, or electronically by email or our website.

We may be asked to send something to you by another supplier on their behalf, and therefore may obtain your information from a third party. We only retain this information as necessary for the task required of us, and we do not use this data for any other purpose.

### **What Kinds of Data/Information do we collect:**

The types of data/information we collect in relation to Consumers is detailed in our Website Privacy Policy.

We collect information from our business customers namely:

- Name,
- Business Name,
- Business Address,
- email address,
- telephone number(s) including mobile telephone numbers that have been provided to us for the purposes of contacting you for business purposes,
- the nature of the business,
- who else you buy from,
- your discount entitlement,
- your purchase order references,
- whether you have a credit account,
- what you have previously bought from us and the price you paid
- whether you have paid by credit card, bank payment or via our internet service.

We collect information from our private customers namely:

- Name,
- Address,
- email address,
- telephone number(s) including mobile telephone numbers that have been provided to us for the purposes of contacting you for business purposes,
- that you are a private individual and not a business,
- your discount entitlement,
- your purchase order references,
- what you have previously bought from us and the price you paid
- whether you have paid by credit card, bank payment or via our internet service.

We collect information from our suppliers namely:

- Name,
- Business Name,
- Business Address,
- email address,
- telephone number(s) including mobile telephone numbers that have been provided to us for the purposes of contacting you for business purposes,
- nature of the business,
- our discount entitlement,
- your sales order references,
- whether we have a credit account, and how we paid you
- what we have previously bought from you and the price we paid.

We collection information from other suppliers namely:

- Contact Name,
- Business Name, if applicable
- Business or Site Address, as applicable

- telephone number(s) including mobile telephone numbers that have been provided to us for the purposes of contacting you for business purposes,

All and/or any information falling into the above categories may be held manually, as well as electronically in order to support our business processes, not least in particular to the event that our electronic services are unavailable.

#### **How do we use it:**

We use the above information for the following purposes:

To fulfil a contract made by you with us, or by us with you for the purpose of trading in goods in accordance with specified and agreed requirements; or

To fulfil a contract made by you with a third party who then asks us to fulfil the contract for the purpose of trading in goods in accordance with specified and agreed requirements; or

To comply with legal financial obligations to include but not limited to reporting our financial position, completing VAT returns, Corporation Tax returns, statutory returns required by Companies House, and the like; or

In line with your request, such as for the provision of a reference, to supply product or financial documentation, and the like; or

To market our business to you.

Not all data collected about you will be used for each of the above purposes. Only the data that is necessary for the purpose will be processed under that purpose, for example only the specified email address and name will be used for marketing purposes.

NOTE: Data provided by a third party who asks us to send you goods will not be processed for any other purpose at any time.

#### **How is your Data/Information shared:**

We do not sell personal information to any third parties.

We share Customer names and addresses as required by law, and in particular with regard to financial returns required by law, such as, and by example, VAT and EC acquisition returns.

We may share Business Address and your given representative's name with a supplier for the purposes of a direct delivery from our supplier to your nominated delivery address and contact name.

We may share Business name, Business Address and a given representative's name with a potential supplier of yours that you have given our details to for the purpose of obtaining a reference.

Email services are recognised as inherently insecure method of sharing information and therefore we have no control over the security of this data. We will not ask you, or send to you or anyone else, your bank or credit card information over email.

Our internet service has the appropriate security measures in place to ensure the security of internet transactions including financial payments. We use third parties, such as SagePay, to support these

transactions and your financial data will be retained securely in these systems in line with the specified legal retention periods. It should be noted that we do not have access to credit/debit card information that is provided via this method.

### **The legal basis for our processing:**

Given the purposes for processing above, the following legal basis for processing will apply:

Legal Obligation – processing of information in relation to any legal or statutory requirement, such as a VAT return, will fall under this basis.

Performance of a Contract – processing in relation to the obtaining or supplying, sending or receiving, specifying, pricing, quoting, of goods including discussing your requirements, following up quotations will fall under this basis.

Legitimate Business Interest – processing in relation to marketing will fall under this basis.

Consent – processing in accordance with your requirements that does not otherwise form a contract between us will fall under this basis, and will be to specific and solely related to the request you make to us, such as the provision of a reference.

### **Your rights:**

The GDPR provides a number of rights for individuals. If you wish to see the full list, please visit the Information Commissioner's Website. With regard to the processing of data we undertake, the following rights are applicable:

- The right to be informed – that's what this document is for
- The right of access – if you wish to access the information that we hold about you, you can request access by emailing [sales@specialized-security.co.uk](mailto:sales@specialized-security.co.uk) or by post to our registered address at the top of this document. Alternatively you can contact us on 01763 274223 and we will be happy to help you through the process.
- The right of rectification – if you believe any of the information that we hold about you is incorrect, we would be grateful for your assistance in getting this corrected or erased, as appropriate.
- The right to erasure – this only applies to data or information that we hold and process under the legal basis of consent. Data processed under the legal basis of fulfilling a contract, or legal requirement, cannot be erased.
- The right to restrict processing – this also only applies to data or information that we hold and process under the legal basis of consent.
- The right to object – you can object to our processing of your data, again using the contact details given above. Where your objection relates to processing that is not required for the purposes of a contract or as a legal requirement, we will do our best to comply with your objection.

You also have a right to lodge a complaint about our processing of your data with the relevant supervisory authority, who is currently the Information Commissioner's Office. Their details can be found at [www.ico.gov.uk](http://www.ico.gov.uk).