

# PRIVACY POLICY

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy policy to inform you, of the types of data we process about you. We also include within this policy 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 policy relates to all customers and suppliers.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all 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 and suppliers to carry out effective and efficient processes. We keep this some or all this data on a secure accounting package or in secure filing cabinet.

Specifically, we hold the following types of data:

- a) contact details such as name, address, phone numbers
- b) bank account details (where applicable)
- c) trading details

## C) LAWFUL BASIS FOR PROCESSING

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

Activity requiring your data	Lawful basis
Retaining trading history to customers	Our legitimate interests
Ensuring efficient administration of sales invoices	Our legitimate interests
Ensuring efficient administration of purchase invoices	Our legitimate interests
Making payments to suppliers via on line banking	Our legitimate interests
Company details	Our legitimate interests for due diligence
Ensuring our administrative and IT Systems are secure and robust against unauthorised access	Our legitimate interests

**D) WHO WE SHARE YOUR DATA WITH**

Employees within our company who have responsibility for placements, purchasing and finance purposes 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 do not share your data with bodies outside of the European Economic Area.

**E) 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.

**F) RETENTION PERIODS**

We only keep your data for as long as we need it for. Some data retention periods are set by law. Retention periods can vary depending on why we need your data, as set out below as per legislation:

<b>Record</b>	<b>Statutory Retention Period</b>
Sales invoices	75 years.
Purchase invoices	75 years.
Company details	75 years.

**G) 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.

**H) 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.

**I) DATA PROTECTION COMPLIANCE**

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

Tracy Smith  
01704518915 or T.smith@newhorizonsnw.co.uk