

GDPR Privacy Notice

This Privacy Notice explains how Ciret Ltd collects, uses, stores and protects personal data in accordance with UK data protection legislation, including the UK GDPR, the Data Protection Act 2018 and amendments introduced by the Data (Use and Access) Act 2025.

It explains:

- who we are;
 - what personal data we collect;
 - how and why we use personal data;
 - who personal data may be shared with;
 - how long information is retained;
 - how personal data is protected; and
 - the rights available to individuals.
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Who we are

Ciret Ltd

Fulflood Road
Havant
Hampshire
PO9 5AX

Company Registration Number: 674416

Ciret Ltd forms part of the Storch-Ciret Group.

What personal data we collect

The majority of the information we collect and process consists of business contact information relating to customers, suppliers and other stakeholders, including:

- names;
- business addresses;
- telephone numbers;
- email addresses;
- account and payment details; and
- records relating to orders, deliveries, enquiries and communications.

We also collect and process personal data relating to employees where necessary for employment, payroll, pensions, training, health and safety and HR administration.

Separate privacy information is provided to job applicants explaining how recruitment-related personal data is collected, used and retained during the recruitment process.

Limited marketing contact information may also be collected from prospective customers and business contacts through trade exhibitions, networking events, enquiries and promotional activities.

How personal data is collected

Personal data may be collected:

- directly from customers, suppliers, employees or job applicants;
- through enquiries, orders and business communications;
- via meetings, exhibitions or trade events;
- from publicly available business information;
- from third parties where appropriate, such as recruitment agencies or referees; and
- through normal use of our website and business systems.

We may use cookies and website analytics tools to monitor website usage and performance. This information is generally statistical in nature and is not used to profile individuals.

How we use personal data

We use personal data only where necessary for legitimate business purposes, including:

- processing enquiries and orders;
- supplying products and services;
- maintaining customer and supplier relationships;
- managing accounts and payments;
- employment administration;
- managing health and safety obligations;
- improving products and services;
- business administration and record keeping; and
- providing marketing communications where permitted.

We do not sell personal data or share personal data with third parties for independent marketing purposes.

Existing business customers may occasionally receive information relating to relevant products or services where this would reasonably be expected in the context of the existing business relationship.

Marketing communications to prospective contacts are managed using appropriate consent arrangements where required.

Lawful bases for processing

The lawful bases relied upon by Ciret Ltd include:

Legitimate Interests

We process information in ways that individuals would reasonably expect in order to operate and manage our business effectively.

Contract

Processing is necessary in order to:

- fulfil customer or supplier contracts;
- provide requested information or quotations; or
- take steps prior to entering into commercial contracts.

Legal Obligation

Certain information is processed in order to comply with legal obligations, including employment, taxation, health and safety and regulatory requirements.

Consent

Consent may be used for certain marketing activities involving prospective contacts or where otherwise required.

Where consent is relied upon:

- consent requests will be clear and specific;
- individuals may withdraw consent at any time; and
- unsubscribe options will be available for electronic marketing communications.

Where special category personal data is processed, this will only be undertaken where permitted under employment, equality and data protection legislation.

International transfers and group IT support

Ciret Ltd's IT systems and support are managed by Storch-Ciret Group, our parent company based in Germany.

As part of normal business operations, personal data may therefore be accessed, stored or supported within Germany and other European Economic Area (EEA) locations through shared systems, infrastructure and IT support arrangements.

Where personal data is processed by Storch-Ciret Group or associated service providers, appropriate data processing agreements, access controls and security measures are maintained.

Where service providers process personal data outside the UK or EEA, appropriate safeguards will be implemented where required.

Who personal data may be shared with

Personal data will only be shared where there is a legitimate business, legal or operational reason to do so.

This may include:

- Storch-Ciret Group for shared IT and system support;
- pension and benefit providers;
- delivery and logistics providers;
- professional advisers;
- regulatory authorities;
- insurers;
- occupational health providers; and
- security or CCTV service providers.

Where third parties process personal data on behalf of Ciret Ltd, appropriate contractual and data protection controls will be implemented where required.

How we protect personal data

Ciret Ltd and Storch-Ciret Group maintain technical and organisational measures designed to protect personal data against:

- unauthorised access;
- loss;
- misuse;
- alteration;
- disclosure; or
- destruction.

These measures include:

- password-protected systems;
- access controls;
- managed IT security arrangements;
- anti-virus and firewall protections;
- restricted access to confidential records;

- secure storage arrangements; and
 - staff awareness and confidentiality controls.
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How long we keep personal data

Ciret Ltd seeks to ensure that personal data is not retained longer than necessary.

Retention periods are determined based upon:

- legal obligations;
- contractual requirements;
- operational business needs; and
- regulatory or financial record keeping requirements.

Information is securely deleted, destroyed or anonymised when no longer required.

Deletion of electronic records may be subject to routine system backup and disaster recovery processes.

Data protection responsibilities

Ciret Ltd has determined that it is not required to formally appoint a Data Protection Officer (DPO).

Overall responsibility for data protection compliance rests with the Managing Director.

Day-to-day coordination of data protection activities, including management of requests and complaints, is undertaken by the Office Manager/Data Protection Lead.

Individual rights

Individuals have rights under UK data protection legislation, including the right to:

- request access to personal data;
- request correction of inaccurate data;
- request erasure or restriction of processing where applicable;
- object to certain processing activities;
- withdraw consent where consent is relied upon; and
- complain to the Information Commissioner's Office (ICO).

Requests relating to personal data should be directed to:

Office Manager / Data Protection Lead
enquiries@ciret.co.uk

Data protection by design and DPIAs

Ciret Ltd aims to adopt a data protection by design approach.

Ciret Ltd operates shared IT systems and infrastructure managed by Storch-Ciret Group. Privacy and data protection considerations relating to shared systems, infrastructure, cybersecurity and major IT changes are therefore managed collaboratively between Ciret Ltd and Storch-Ciret Group.

Where business, operational or local process changes are identified by Ciret Ltd, consideration is given to privacy and data protection requirements at the earliest stage of planning and throughout the lifecycle of the activity.

Where appropriate, Data Protection Impact Assessments (DPIAs) or equivalent privacy risk reviews will be undertaken.

Complaints

Ciret Ltd seeks to handle personal data fairly and transparently.

Any concerns or complaints relating to data protection should initially be directed to:

Office Manager / Data Protection Lead

Ciret Ltd
Fullood Road
Havant
Hampshire
PO9 5AX
Email: enquiries@ciret.co.uk

Complaints will be investigated and responded to within a reasonable timeframe.

Individuals also have the right to complain to the Information Commissioner's Office (ICO):

<https://www.ico.org.uk>

Phil Phillips
Managing Director

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