

# Privacy Notice

This **Privacy Notice** sets out the steps we follow when personal data is collected, such as our identity and how we intend to use the information, the lawful basis for processing the data, our data retention periods and that individuals have a right to complain to the ICO if they think there is a problem with the way we are handling their data.

## Who we are

Ciret Ltd

Fulflood Road, Leigh Park, Havant Hampshire PO9 5AX

Registration number:674416

Part of the Storch-Ciret Group – <http://www.storch-ciret.com/en/our-brands/storch.html>

## What information we collect and hold that constitutes personal data

The majority of the information we collect and hold that can be classed as 'personal data' is name, address and other contact details such as email address and telephone number of our existing customers, suppliers and other stakeholders, to enable us to provide our products and services. Additionally, we will hold the information required for collection and payment of invoices.

We also collect and hold information on staff necessary to manage and support our employees.

For new prospects we use names, addresses and other details such as email addresses and telephone numbers, to contact individuals to gain consent to use their data for marketing purposes in order to generate new business. We only hold this information once we have obtained consent to retain their data and explained the purposes of doing so.

## How is it collected and by whom?

Personal data is collected when we are asked to provide pricing for a product, answer enquiries on our product range, or to engage the services of a supplier. This will be done by a member of our team, for example, a buyer, or salesperson. New prospect data may be collected in a number of ways such as from a prospect company's web site, meetings at exhibitions or business networking events. Staff data is collected from the employee directly upon application to the company, then on an ongoing basis for the purposes of their employment.

We may use Google Analytics and Cookies on our web site to record quantitative data such as visitor numbers, pages viewed etc. but we do not track individuals online e.g., using Lead Forensics, or use inferred information through algorithms, or profile people by analysing data derived from combining other data sets.

## What we do with the personal data we process

We are only collecting information we need and are going to use. We use the 'personal data' generally for carrying out our business as a manufacturer and distributor of decorators' sundries to trade, for example, to answer a pricing query, answer enquiries, create delivery notes, communicate information relating to the company and our business.

We do not use your information for a particular purpose other than to carry out our business and communicate with you where appropriate, nor do we collect personal data by observation or draw inference from any individual's behaviour. We will not share any data with third-parties for marketing purposes.

We may, however, use the data provided by an existing customer to send them information on a related product or service that we think may be beneficial to their business. This would only be done in a reasonable way, and in a manner that a business contact would expect.

## How long we keep personal data

We have specific retention times for each category of data which are set out in our **Information Asset Register**.

## Who will your data be shared with

Data will only be shared with external third parties when there is a specific business need, for example we might share data would be if we were to outsource an aspect of work, or employee data will be shared with the pension or healthcare provider.

To cover this sharing of data, we have contracts in place with all the suppliers that may come into contact with any of the data we hold, to ensure the supplier is compliant with GDPR, and recognise their responsibilities when processing our data.

All reasonable steps are being taken to ensure data security both organisationally and technologically. As part of our data security measures, staff can only access our computer systems through password protected system with access levels as relevant to their job responsibilities. Personnel files are confidential and are stored as such in locked filing cabinets. Only authorised employees have access to these files

Storch-Ciret Group manages our IT network, which in turn means we are 'sharing' data with them. They ensure data security on the network identifying and managing any IT security risks, for example by keeping our virus protection software and firewall protection current, and. Locally we manage some personal data for example as CCTV which is shared with our security contractors.

**What will be the effect of this on the individuals concerned?**

There should be no impact on the individual as a result of our processing. We aim to always be fair, transparent and ensure that people know how their information will be used. Data security is a key consideration and we do everything we can to protect the data we hold.

This applies whether the personal data was obtained directly from the data subjects or from other sources.

**Is the intended use likely to cause individuals to object or complain?**

Our use of data will not have any unjustified adverse effects on individuals. We are only using information in a way which they would expect.

There are no adverse consequences of not providing information to us - for example, non-receipt of a benefit.

**The Lawful Bases of our data processing**

The lawful bases for our data processing activity are a combination of **Legitimate Interest and Contractual** for activities relating to staff, suppliers, existing customers and other stakeholders, and **Consent** for marketing communications purposes to new prospects.

In general terms the purpose of processing information is to enable us to provide our products to customers, to support and manage our employees, promote and advertise our products and services, and maintain our own accounts and records.

**Legitimate Interests:**

- We use people's data in ways they would reasonably expect in order to carry out our business and communicate with them.
- Processing is necessary as we could not provide products and ongoing services to prospects and our existing customers without processing this information.
- We have balanced our commercial interests against the individual's interests, rights and freedoms. Our processing has a minimal privacy impact.

**Contract:**

- We have a contract with an individual and need to process their personal data to comply with our obligations under the contract ie employment contract
- We haven't yet got a contract with an individual, but they have asked us to do something as a first step (eg provide a product information) and we need to process their personal data to do what they ask.

**Consent:**

- We aim to deliver effective, timely communications to our prospects, such as newsletters, relevant information on product range etc.
- Consent is the most appropriate legal basis for the processing of new prospect information. We would obtain consent in order to provide communications relevant to commercial requirements. We will always make it

clear when requesting Consent what the data will be used for and have clear, simple ways for people to withdraw consent.

We will explain our lawful basis for processing personal data when we answer a 'subject access' request.

#### **Who the Data Controller / DPO is**

We have identified that it is not necessary for us to appoint a Data Protection Officer (DPO), however our Managing Director has overall responsibility for the control of data collected and held by us, The Office Manager has been nominated for the day to day running of Data Protection within Ciret Ltd and also monitors and maintains GDPR compliance.

Individuals have the right to request access to the data we hold on them by submitting a request to do so addressed to Office Manager, who will provide details on any information retained by us as outlined in our **Data Protection Policy**.

#### **Data Protection by Design and Data Protection Impact Assessments**

We aim to adopt a privacy by design approach and will carry out a Privacy Impact Assessment (PIA), also referred to as 'Data Protection Impact Assessments' (DPIA), as part of our GDPR compliance system in situations where data processing is likely to result in high risk to individuals, for example:

- where a new technology is being deployed;
- where a profiling operation is likely to significantly affect individuals; or
- where there is processing on a large scale of the special categories of data.

If a DPIA indicates that the data processing is high risk, and we cannot sufficiently address those risks, we will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

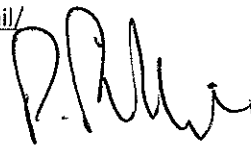
#### **The right to complain**

We always seek to treat an individual's data fairly, however, individuals have the right to complain to us and we will investigate and respond accordingly within one month. Complaints should be sent addressed to:

Office Manager, Ciret Ltd,  
Fulflood Road, Leigh Park, Havant Hampshire PO9 5AX  
Registration number:674416

Should the response not be resolved to the satisfaction of the complainant, the individual can also take up their issue with the Information Commissioner's Office (the ICO) at the following address:

The Information Commissioner's Office,  
Wycliffe House, Water Ln, Wilmslow SK9 5AF  
Or via EMAIL: <https://ico.org.uk/global/contact-us/email/>



Managing Director