

## Data protection (GDPR) policy

### Introduction.

To run a successful business and uphold our duty of care to our employees and provide expertise to our customers, Powdertech (Corby) needs to gather and use certain information about individuals. This does not affect our obligations regarding user privacy and data protection.

We maintain that: User privacy and data protection are human rights. We have a duty of care to the people whose data we hold. Data is a liability, it should only be collected and processed when necessary. We will never sell, rent or otherwise distribute or make public your personal information.

This extends to customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data is collected, handled and stored to meet the company's data protection standards and to comply with the Data protection Act 1988 and its successor The EU General Data Protection Regulation 2018 (GDPR).

### Policy overview

All data acquired by, stored by and used by Powdertech is purely for the continuance of business.

Individual customer information is retained only for business use and contains only their business information not personal information that would not be needed outside of business transactions, for example home address, phone number etc.

Employee details are acquired as part of the employment process and includes home address, next of kin, contact numbers and other such information as is required to comply with relevant law appertaining to employment.

### Data security

Data in the form of purchase orders, sales orders, CRM records, general correspondence and emails are hosted by our data partner, Wavenet Limited.

Our partner has a double secure storage system where data is encrypted and split between 2 locations so that whole messages are not accessible. Data is backed up daily.

Local information is not held on individual desktops, it is accessed from and stored on a server based on the premises. This server is backed up to the Wavenet servers, hourly.

This data can't be accessed away from Powdertech (Corby) Limited. Data is backed up daily onto the Wavenet secure servers. Data from financial transaction data (credit card payments) is processed by authorised employees only and not retained. The server is located away from the main factory and office environment and is protected by firewall and security software and a UPS back up. Access to computers is by 8 alpha-numeric password with no central record of passwords. We regularly meet with our data partner to review security.

### Acquiring and storing information

Powdertech does not use Google Analytics to monitor traffic to our web site.

We subscribe to Barbour Lead Generation. The leads from this source are pre-validated by Barbour and comply with GDPR regulations.

We maintain a list of customers and suppliers on Sage accounting systems and the information stored is received as part of normal commercial transactions.

For sales and marketing purposes we store information on Act! CRM database. This database is password protected and accessible only by named and authorised personnel whilst on company premises.

We do not buy mailing lists and all data stored is as a result of customer enquiries that generate quotations and subsequent commercial correspondence. Blogs, Twitter & Instagram are separate to our computer database and no information is transferred from one to the other or stored by Powdertech.

We do include on all correspondence the opportunity to sign up or opt out of emails. However, we assume that if you contact us requesting information, quotation or something to do with our business that we can contact you back without your permission.

### **Using your information**

The information stored by us is only used in the pursuit of legitimate business. We send out regular information “e-shots” via our email marketing provider Campaign Monitor. Campaign Monitor has a strict policy adhering to GDPR which you can read here: <https://www.campaignmonitor.com/trust/gdpr-compliance/> If you opt-out after any mailshot via Campaign Monitor then you are automatically deleted from any further mailshots.

We send out introductory emails from Barbour to named recipients identifying specific projects. We monitor the response but do not follow up unless the recipient contacts us first. Once beyond this contact we consider the relationship to be a consensual business one with a de-facto agreement to continue the correspondence.

### **Links**

Our website may include links to other sites, not owned or managed by us. We cannot be held responsible for the privacy of information collected by websites not managed by us.

### **Attaining consent**

When we are contacted directly it is assumed that our reply can be sent without seeking consent however all our email communication includes a request to tell us your communication preferences.

When we are contacted via our web site your data will not be added to our database unless a positive opt in is received. Our CRM database has a field that identifies the customers GDPR status as “Opt in” or “Opt out”. This database is regularly checked and is the only database from which we compile Powdertech mailing lists. We do not include “opt-out” contacts in mailings.

### **Right to be forgotten**

We want you to want to receive communication from us, but we respect your right to be forgotten. If you opt-out, you will be deleted from our CRM database. You can always opt back in later.

The exception to this is if we hold contractual information containing records of financial transactions, product guarantees or project correspondence. This information is held on our Sage financial system and our Act! CRM system and email records. This can't be deleted for either the period of the guarantee (up to 40-years) or the financial records (up to 7-years). Your record will be marked “opt out” to prevent unsolicited ongoing communication.

### **Breach of data**

If we believe that our data has been breached with the potential loss of identifiable data, then we will inform our 3rd party processors within 72 hours.

### **Accessing and updating your personal information**

You can request access to any information we hold about you by contacting us.