



## Privacy Policy

This policy has been updated to take into account the new General Data Protection Regulation that became effective as of the 25<sup>th</sup> May 2018. The purpose of this policy is to advise you how we collect use and store any of the personal data that you share with us, via our website or otherwise. This policy will refer to you, the individual, as the Data Subject. Compressed Air Solutions Ltd will be referred to as the Data Controller. This Policy relates to the customers and suppliers of Compressed Air Solutions. The privacy of employees is covered under the company Data Protection Policy.

The Data Controller is a limited Company registered in England, number 5588173. They are registered with the Information Commissioners Office (ICO) as a Data Controller.

### **Data Collection:**

Data is collected from the Data Subject, by the Data Controller, when:

- The Data Subject purchases a product or service from the Data Controller
- The Data Subject provides the Data Controller with a product or service
- The Data Subject communicates with the Data Controller via email or any other means
- The Data Subject completes documentation for the Data Controller as part of their ISO 9001:2015 evaluation processes
- The Data Subject provides information for contractual purposes

NOTE: The Data Controller will not collect information from their website; however, the Web Site may provide links to other (third-party) websites for information purposes. Linked sites will have their own privacy notices or policies, which we strongly encourage you to review. We are not responsible for their content, use of the websites or the privacy practices of the websites.

### **Purpose:**

The Data Controller will only hold and use Data Subject information for the purpose of maintaining and/or developing business trade between themselves and their customers and suppliers. This includes for the purposes of:

- Maintaining effective contractual communication
- Fulfilment of contractual obligations
- Ensuring correct invoicing
- Receiving products and services from suppliers
- Delivering our products and services to customers
- Security purposes such as carrying out identity checks for fraud prevention and helping to reduce modern day slavery in the UK
- Demonstrating both the Data Controller and their sub-contractor's competency to carry out contractual work
- To keep the data subject up to date with products and services (only if additional consent for this information has been given)
- Internal analysis of customers and suppliers



### **Date Collected**

The Data Controller will only look to collect the following personal data from the Data Subjects of their suppliers and customers in order to fulfil contractual requirements: Name, job title, work address, email address and work contact telephone numbers; company bank account details and related financial information.

The Data Controller may, from time to time, require additional information (training records and certificates) from some of their suppliers (sub-contractors providing labour), to allow them to demonstrate competency levels as part of a contractual obligation. It may also be necessary to request additional personal data from such suppliers, for the purpose of security clearance. Wherever possible, the Data Controller will look to avoid having to collect such data and seek to find alternative means of fulfilling this requirement.

### **Data Storage:**

Data will be stored on the Data Controllers secure server that includes a bespoke database and Microsoft Exchange Server.

Any data received by any other means may be transferred to the Data Controllers secure server or retained by one of their Data Processors (e.g. invoices/orders).

Any additional information or data requested from relevant suppliers, in order to demonstrate competency or for security clearance purposes, will be stored in 'Management Access Only' files on the Data Controllers secure server. These files will only be accessible by the key Data Controllers (Company Directors) and the Data Processors (Safety Officer, IT Manager and Accounts)

### **Sharing Data:**

The Data Controller will not share Data Subject contact information (customer or supplier) with any other company or organisation, unless required to do so by law, as part of a contractual obligation, or prior written consent has been given by the Data Subject.

### **Data Retention and Your Rights:**

Contact information will be deleted from the Data Controller's records seven years after the cessation of the supplier or customer contractual or non-contractual working partnership, unless otherwise requested in writing by the Data Subject.

Where additional information (training records and certificates) have been requested from suppliers providing labour, this information will be retained for a period of three years following the end of the contract for insurance purposes. Any additional personal data collected for security purposes will be deleted three months after cessation of the contract.

The Data Subject has the right to withdraw their consent for the Data Controller to collect, use and store their data, at any time, by contacting the Data Processor – [gdprprocessor@compressedairsolutions.co.uk](mailto:gdprprocessor@compressedairsolutions.co.uk)

The Data Subject has the right to request a copy of the data held about them, by contacting the Data Processor – [gdprprocessor@compressedairsolutions.co.uk](mailto:gdprprocessor@compressedairsolutions.co.uk)

The Data Subject has a right to lodge a complaint with the Information Commissioner's Office (ICO). Complaints about the Data Controllers information rights practises should be raised with the Information Commissioners Office (ICO) on 0303 123 1113.



**Relevant Policies:**

This policy should be read in conjunction with the Data Controllers 'Data Protection Policy' and 'Back Up and IT Security Policy'.

This Policy will be reviewed subject to legislative changes.

A handwritten signature in black ink, appearing to read "M T Scott", is written over a light grey rectangular background.

Mark Scott, Managing Director  
14<sup>th</sup> October 2021