

GDPR Privacy Notice - Stakeholders

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our stakeholders, of the types of data we may process about you. We also include within this notice 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 notice applies to current and former clients, suppliers etc.

1. DATA PROTECTION PRINCIPLES

Under GDPR, all personal 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

2. TYPES OF DATA HELD

We keep several categories of personal data on our stakeholders in order to carry out effective and efficient processes. We keep this data in secure files and we also hold the data within our computer systems, for example, our payment system.

Specifically, we may hold the following types of data:

- a) personal details such as name, address, phone numbers, email
- b) bank account details
- c) business details such as registration and VAT numbers

3. COLLECTING YOUR DATA

You provide several pieces of data to us directly during the introduction of our relationship and subsequently during our relationship.

Personal data is kept in files or within the Company's payment, production and marketing systems.

4. LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with our legitimate interest or in order to effectively manage the contract we have with you, including ensuring you are paid correctly.

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

Activity requiring your data	Lawful basis
Carry out the contract that we have entered into with you e.g. using your name, contact and bank details	Performance of the contract
Ensuring you are invited to our events and kept up-to-date with our product lines	Our legitimate interest
Dealing with legal claims made against us	Our legitimate interest

5. SPECIAL CATEGORIES OF DATA

We will not process any special categories of data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

6. FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you. This could include being unable to deliver products ordered.

7. WHO WE SHARE YOUR DATA WITH

Employees within our company will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data may be shared with third parties for the following reasons:

- a) company audits
- b) fulfilment of contract e.g. third party direct deliveries

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We may on occasion share your data with bodies outside of the European Economic Area. To ensure your data is secure we will:

- a) password protect any data sent to the third party
- b) obtain a data processing agreement with the third party

8. 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.

9. RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your relationship with us. Retention periods can vary depending on why we need your data.

10. AUTOMATED DECISION-MAKING

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

11. RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a. the right to be informed about the data we hold on you and what we do with it;
- b. the right of access to the data we hold on you.
- c. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d. the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e. the right to restrict the processing of the data;
- f. the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g. the right to object to the inclusion of any information;
- h. the right to regulate any automated decision-making and profiling of personal data.

12. 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.

13. MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner's Office (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.

14. DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:

Melissa Cawston
melissa.cawston@proportion.london
0208 498 3072

YOUR PRIVACY ON OUR WEBSITE

Our policy is to collect no personal information about you when you visit the proportionlondon.com or other group websites, unless you affirmatively choose to make such information available to us.

When you visit the proportionlondon.com website, the web server automatically solely recognises the Internet domain and IP address from where you accessed the site. This information does not result in the identification of your personal e-mail address or other personal information. The information collected is only the file volume and timing of access to the site whilst visiting the site. This is done so that the content of the site can be improved, and your personal information is not identified.

If you choose to share personal information, by such means as filling out a web form or emailing us, with personal information, the information will not be disclosed to third parties, unless required by law or with your express permission. If you have other questions about this privacy policy please feel free to e-mail us at info@proportionlondon.com.