

ARKLE ELECTRONIC SYSTEMS LTD.

Unit 15 Wedgwood Gate,
Wedgwood Way,
Stevenage,
Hertfordshire.
SG1 4SU

Telephone: 01438 721710
Facsimile: 01438 726565

WWW.ARKLE-ELECTRONICS.CO.UK

EMAIL: nichola.carroll@arkle-electronics.co.uk

ARKLE ELECTRONIC SYSTEMS LIMITED PRIVACY POLICY

CUSTOMERS AND SUPPLIERS

In this document we propose to understand and set up procedural requirements to ensure we have covered all of the requirements for General Data Protection Regulation (GDPR)

Each of the highlighted areas have been reviewed and stated in this document and will be reviewed for accuracy yearly.

The information within this document will also direct all interested parties towards applicable procedures and systems created to support (GDPR).

Process route

1. Awareness
2. Information we hold
3. Communicating Privacy information
4. Individuals rights
5. Subject access requests
6. Lawful basis for processing personal data
7. Consent
8. Children
9. Data breaches
10. Data protection by Design and Data Protection Impact Assessments
11. Data Protection Officers
12. International

We take your privacy very seriously therefore we urge you to read this policy very carefully because it contains important information about us and:

- the personal information we collect about you, our Customers and Suppliers;
- what we do with your information; and
- who your information may be shared with.



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CUSTOMERS AND SUPPLIERS

1. Awareness

Arkle Electronic Systems Limited (company registered number: 06745343) ('we' or 'us') are a 'data controller' for the purposes of the Data Protection Act 1998 & GDPR May 2018 (i.e. we are responsible for, and control the processing of, your personal information).

We have appointed the following person as our representative for the purpose of the Data Protection Act & GDPR:

Nichola Carroll.

2. Information we collect and hold

a) Personal information you provide to us

We collect the following personal information that you provide to us:

- Your company name
- If Subsidiary or Division (Name of Parent Company)
- Vat registration number
- Company registration number
- Contact details for individual or members of the staff which your company employs
- Telephone numbers
- Email addresses
- Locations including delivery; invoicing; purchasing (should they not be the same)
- Credit references or checks undertaken at time of account set up
- Bank account details for payments or credit checks to assess credit worthiness (please note these details are kept on a secure banking site on SAGE system with access rights or if documented in locked filing cabinet)

b) Personal information provided by third parties

We may receive information about you from other sources. This information may include any of the data previously detailed:

We will add this information to the information we hold about you for the following purposes:

- to allow clarification and communication points for any data we need to share with yourself

Registered Office: Richmond House, Pond Close, Stevenage, Herts SG1 3QP
Registered in England Registration No. 06745343





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c) Personal information you provide about third parties

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you:

- shall consent on their behalf to the processing of their personal data;
- shall receive any data protection notices on their behalf; and
- shall consent on their behalf to the transfer of their personal data abroad.

How we use the information we collect

We collect information about our Customers and Suppliers for the following purposes:

- for any enquiries made via the website, we will only use the information provided to make contact with the individual or Company
- to undertake legal business transactions with either Customer or Supplier
- we may also update you about Arkle Electronic Systems Limited and its services if you have consented us to doing so

3. Communicating Privacy information

We may share your information with:

- Law enforcement agencies in connection with any investigation to help prevent unlawful activity.

Keeping your information secure

We will use technological and organisation measures to keep your information secure. These measures may include the following examples:

- user account access is controlled by a unique username and password; and
- all data is stored on secure servers and limited to authorised staff
- paper documented information recording the previously mentioned data for personal records; these documents will be held in a secure area with access restricted

Where data is recorded from internet access, we will use all reasonable efforts to secure your personal data, in using the site you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or

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CUSTOMERS AND SUPPLIERS

to you via the internet. If you have any particular concerns about your information, please contact us using the details within this policy.

4. What rights do you have?

- the right to be informed
- the right to access to said data
- the right to rectify any such data should you find inaccuracies
- the right to erase any information not seen as being a part of data required for business transactions to take place legally
- the right to restrict processing should you so wish
- the right to data portability
- the right to object

5. Subject access request

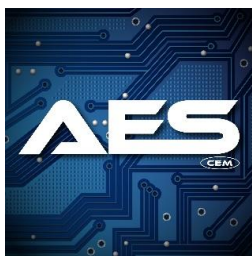
You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or it, please:

- email, call or write to us (using the contact details below);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information you want a copy of, including any account or reference numbers, if you have them.

Right to rectification

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- contact us using the contact details below;
- let us have enough information to identify you (e.g. account number, user name, registration details); and
- let us know the information that is incorrect and what it should be replaced with



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CUSTOMERS AND SUPPLIERS

Right to restrict processing

If you require us to restrict processing your data to storage only, please contact us using the details below.

Right to ask us to stop contacting you with direct marketing should we undertake this as an opportunity

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to us (using the contact details within this policy);
- let us have proof of your identity and address (a copy official company headed paper for example); and
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

From time to time we may also have other methods to unsubscribe from any direct marketing including for example, unsubscribe buttons or web links. If such are offered, please note that there may be some period after selecting to unsubscribe in which marketing may still be received while your request is being processed.

Right to erase

You can ask us to erase all of your data held by us without undue delay, to do so please contact us using the details below.

Right to data portability

If you require a copy of your personal data in a structured commonly used format so that it can be easily transferred to another data controller, please contact us using the details within this policy.

6. Lawful basis for processing personal data

We are allowed to process your personal data on the basis that it is in our legitimate interests to:

Monitor how our website is used in order to improve it. We use would propose to use aggregated data to do this so it does not impact on your privacy.

Respond to enquiries, complaints and requests in order to serve our customers. We will only use your personal data for this purpose. If you are an existing customer, we may add information about the enquiry, complaint or request to other records we hold about you so we can provide a better customer service.



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CUSTOMERS AND SUPPLIERS

Respond to your request to purchase, so that we can fulfil your order,

Send you materials you have requested, using the data you have provided.

Please be aware that you have the right to object to the processing of your data of any of the legitimate interests identified.

7. Consent

If at any time you wish to remove any consent for the data that we hold please contact us using the details within this policy

8. Children

Arkle Electronic Systems Limited do not employ persons under the age of 16 to work within the company and do not expect any of its Customers or Suppliers to do so either, if you are employing personnel below this age bracket please inform us so we can make an educated decision about continuance of business.

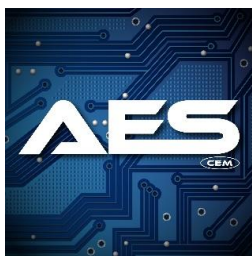
9. Data breaches

If any data breaches are found to be present we will inform the individual or individuals that their data has been compromised and work with them to ensure security again.

10. Data protection by Design and Data Protection Impact Assessments

The details we hold are kept to a minimum in order to allow us to undertake “Legitimate business with you our Customer or Supplier” and ensure we have sufficient information to support the continuance of said business.

We have robust procedures for the retention of said data and will review them where necessary on a yearly basis as a minimum. Or sooner if a data breach should occur.



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11. Data Protection Officers

Arkle Electronic Systems Limited have allocated a “Data Protection Officer” should this person leave the employ then the Managing Director will allocate a suitably trained person to replace him or her. The details of positions within the company are shown in the list shown within this document and will be reviewed on a yearly basis with a view to updating where required at that point.

12. International

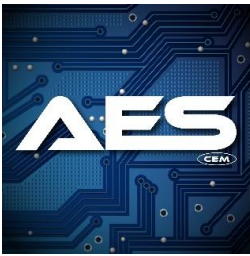
Arkle Electronic Systems Limited “Do Not Operate cross boarder processing” However if they should undertake this in the future they will assign a “Data Protection Supervisory Authority” to cover such needs as defined within this procedure.

Do you need extra help?

If you would like this policy in another format (for example: large print) please contact us using the details within this policy.

Changes to the privacy policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version. The most up-to-date version will always be available for you to review.



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Contacting us

If you have any questions about this policy or the information we hold about you, please contact us by:

- e-mail at: nichola.carroll@arkle-electronics.co.uk
- post at:

Arkle Electronic Systems Limited
Unit 15 Wedgwood Gate,

Wedgwood Way

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- telephone on: 01438 721710

Calls will be answered at the following times:

Monday – Thursday: 8am to 5pm

Friday: 8am to 1pm





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DATA PROTECTION POLICY

Our Approach to Data Protection

This policy sets out the Arkle Electronic Systems Limited approach to data protection and information management, including how the Arkle Electronic Systems Limited manages confidential information and the precautions the Arkle Electronic Systems Limited takes to keep information secure.

The person responsible for this policy is Nichola Carroll. The policy is reviewed and updated if required annually.

Information Asset Register

The Arkle Electronic Systems Limited register appears as an appendix letter/Email.

Protection and Security of the Information Assets

The great majority of the information assets are confidential. We take care to protect confidential information applying the principles set out in this Policy.

The policy has been circulated to staff to remind them of their responsibilities.

Retention and Disposal of Information

We retain information for the periods set out in the Quality Assurance procedures. These periods reflect our data protection obligation not to keep personal data for longer than is necessary, and also our statutory, regulatory and business needs to keep records.

Thereafter information is disposed of securely, by shredding, electronic deletion, or otherwise as appropriate.

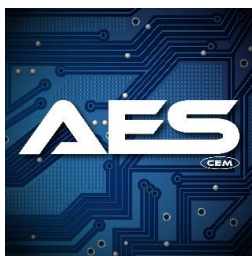
Firewalls

The firm maintains a firewall to prevent unauthorised access to the firm's network and data.

Procedures to Manage User Accounts

Arkle Electronic Systems Limited does not record user accounts, but if they were to be added to our system the control of the data would fall in line with the responsibilities of Nichola Carroll and would be managed by her to support the data protection in the same way as detailed previously. User accounts can be disabled at any time, for example on discovering a breach of security. Accounts access are disabled when a member of staff leaves the firm.

Staff responsible for the management of payments are only recruited or assigned to that function after passing suitable background checks, including taking references and the verification of claimed qualifications.



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Procedures to Detect and Remove Malicious Software

If, despite the precautions described elsewhere malicious software (malware) is present on the system this should be detected by the Arkle Electronic Systems Limited anti-virus software. It is then the responsibility of the Arkle Electronic Systems Limited IT contractor, GCIS to remove the malware, according to the nature of the threat and industry standard procedures at the relevant time.

Register of Software Used by the Practice

The Arkle Electronic Systems Limited currently uses the following software:

Sage, Outlook, Adobe, Microsoft Office, Arkle Electronic Systems Limited Website.

Training for Personnel on Information Security

The Arkle Electronic Systems Limited has provided all staff with its information security rules and recirculates them to all staff at least annually.

Updating and Monitoring of Software

All software used by the Arkle Electronic Systems Limited is supported by external software suppliers who issue routine updates from time to time.