Clydesdale Data Protection Policy



Revision 2 20th February 2023

Contents

| 1 | Gen | eral personal data holding formats: | 1 |
|---|------|---|---|
| 2 | Spec | cific personal data holding requirements: | 2 |
| | 2.1 | Customers, Quoting towards raising an order: | 2 |
| | 2.2 | Customers, marketing using held personal information: | 2 |
| | 2.3 | Customers, sales orders – electronic records: | 2 |
| | 2.4 | Customers, sales orders – hard copy records: | 3 |
| | 2.5 | Suppliers, purchase orders – electronic records: | 3 |
| | 2.6 | Suppliers, purchase orders – hard copy records: | 4 |
| | 2.7 | Personnel personal data – electronic records: | 4 |
| | 2.8 | Website records – Web sales | 4 |
| | 2.9 | Website records – Cookies | 5 |
| 3 | Non | -system personal records | 5 |
| 4 | Con | tact us about your data | 5 |
| | 4.1 | Email: | 5 |
| | 4.2 | Internet: | 5 |
| | 4.3 | Telephone: | 5 |
| | 4.4 | Postal: | 5 |
| | 4.5 | Data Protection Officer: | 5 |
| 5 | Data | a Protection Policy review | 5 |

1 General personal data holding formats:

Quoting personal data is held in the database tables of the "Blueprint" system on a secure, offsite web server

Sales and purchasing personal data is held in the database tables of the "Opera" system on a secure, onsite server backed up by tape drive. Scans of accompanying and related documents are scanned into the "Document manager" add-on of the Opera system.

Sales and purchasing personal data is also held in hard copy format in folders along with various notes and ancillary information not held on opera. These records are kept in dedicated storage areas at Clydesdale's premises. These premises are protected with passive and active security systems.

Web sales are made through "Joomla" and various additional Joomla add-ins to allow us to access the details submitted as part of a web order. This information is tored on a secure, off-site web server.

Personnel details are kept in dedicated electronic folders accessible buy the Clydesdale MD

2 Specific personal data holding requirements:

2.1 Customers, Quoting towards raising an order:

In order to successfully provide an accurate quote that can be converted to a sales order if required, Clydesdale may require the following electronically-held information.

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address

In order to support future enquiries against this quote, Clydesdale will retain this personal information for 5 years after the last contact with the owner of the personal data.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted.

2.2 Customers, marketing using held personal information:

If Clydesdale would like to send marketing information to a customer or the recipient of a quote then we will seek active, positive confirmation that the owner of the personal data agrees to this before engaging in any form of marketing.

- First name
- Last name
- Contact address
- Email address

This information is the same dataset as that used for quoting and so will be retained for 5 years after the last contact with the owner of the personal data.

At any point during this period the owner of this personal data may request to see the data held, request that marketing activities are stopped, request that the data be corrected or request that it be deleted.

2.3 Customers, sales orders – electronic records:

In order to process customer sales and deliver goods, support warranty claims, ease repeat business and offer traceability on items such as Category III PPE, Clydesdale may require the following electronically held-information.

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address
- Credit card details

In order to support future enquiries against this sales order and to fulfil the minimum data-holding requirements issued by HMRC, Clydesdale will retain this personal information for 5 years + current year to date after the sales order was issued.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted

2.4 Customers, sales orders – hard copy records:

In order to process customer sales and deliver goods, support warranty claims, ease repeat business and offer traceability on items such as Category III PPE, Clydesdale keep hard copy records of order and invoice information

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address
- Credit card details

In order to support future enquiries against this sales order and to fulfil the minimum data-holding requirements issued by HMRC, Clydesdale will retain this personal information for 3 years + current year to date after the sales order was issued.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted

2.5 Suppliers, purchase orders – electronic records:

In order to process supplier purchase orders and receive goods, support warranty claims, ease repeat business and offer traceability on items such as Category III PPE, Clydesdale may require the following electronically held-information.

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address
- Credit card details

In order to support future enquiries against this purchase order and to fulfil the minimum data-holding requirements issued by HMRC, Clydesdale will retain this personal information for 5 years + current year to date after the purchase order was issued.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted

2.6 Suppliers, purchase orders – hard copy records:

In order to process supplier purchase orders and receive goods, support warranty claims, ease repeat business and offer traceability on items such as Category III PPE, Clydesdale may require the following hard copy records of order and invoice information

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address
- Credit card details

In order to support future enquiries against this purchase order and to fulfil the minimum data-holding requirements issued by HMRC, Clydesdale will retain this personal information for 3 years + current year to date after the purchase order was issued.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted

2.7 Personnel personal data – electronic records:

Personal data to do with individual employees working for Clydesdale will be kept in electronic formats.

This will typically include, but is not exclusive to:

- Staff contact information
- Staff bank details
- Staff driving details and licensing
- Staff medical history
- Staff training records.
- Staff disciplinary records
- Staff contracts of employment
- Staff tax records

2.8 Website records – Web sales

In order to process customer website sales and deliver goods, support warranty claims, ease repeat business and offer traceability on items such as Category III PPE, Clydesdale may require the following electronically held-information.

- First name
- Last name
- Contact address
- Delivery address
- Phone number
- Email address

In order to support future enquiries against this sales order and to fulfil the minimum data-holding requirements issued by HMRC, Clydesdale will retain this personal information for 5 years + current year to date after the sales order was issued.

At any point during this period the owner of this personal data may request to see the data held, request that it be corrected or request that it be deleted

The online payment system doesn't require that Clydesdale have access to or retain credit card information.

2.9 Website records – Cookies

Clydesdale do not use internet marketing techniques, any cookies collected about users are currently only used by Clydesdale to analyse our Search Engine Optimisation.

Clydesdale are currently investigating upgrading our website technology to allow a positive opt-in on these cookies as a future development to allow user control of their personal information

3 Non-system personal records

Clydesdale are engaging in a process of analysing any personal data that may inadvertently be held on systems not described in sections 1 and 2 above. Any records held in these uncontrolled formats will be deleted from our holding.

4 Contact us about your data

4.1 Email:

GDPR@clydesdale.net

4.2 Internet:

https://www.clydesdale.net/GDPR-page

4.3 Telephone:

+44 (0)1234 855855

4.4 Postal:

3 Sunbeam Road

Kempston

Bedfordshire

MK42 7BZ

4.5 Data Protection Officer:

Clydesdale do not fulfil the requirements of needing a data protection officer registered with the ICO. For GDPR related queries contact Simon Raglione-Hall using the above details

5 Data Protection Policy review

This policy will be reviewed yearly to ensure it continues to reflect legislative and ethical requirements and is effective at protecting Personal Information