

# GDPR Policy

This policy was last updated: April 2020

Elexion Water Treatment Ltd respect your privacy.

Following the introduction of the General Data Protection Regulation (GDPR) from the 25<sup>th</sup> May 2018, which is the legislation regarding data protection. Elexion have produced the following policy:

## 1 Awareness

All key members of staff within Elexion are aware of the new GDPR Laws. These include Directors and Line Managers. Any other member of staff either new or existing will be or have been made aware of the new legislation and been advised of their roles in adhering to the regulations.

## 2 Information we hold

The personal data we hold about our customers, staff and other business partners.

### 2.1 Details we hold of our customers

This information we store has all been given to us by the customer. The data will include but not be limited to:

- Name(s)
- Address(es)
- Telephone Number(s) (Landline and Mobile)
- Email Address(es)

We require this information to ensure we can run our business successfully and efficiently as possible and supply our customers with the products and services they have requested. The information is given to us by our customers either by phone, email or occasionally post. Customers are advised their details are required to be logged on our computer system and will be used for servicing, maintenance, delivery and invoicing purposes. Only authorised personnel have access to our secure computer system. Each have their own username and password, all events are also tracked so the system can recognise who has made any data entry.

We also take card payments from customers which means we need to take personal data at the point of the transaction. This is only ever done by phone and we ask that our customers do not send any card details to us via any other method.

We use Worldpay and all transactions are captured during the customers call, no credit card details are stored on our system or written down and kept by Elexion. All transactions are stored securely on the Worldpay system.

### 2.2 Details we hold of our staff

As we may employ members of staff, we may also hold sensitive information about them. When a new member of staff begins employment with Elexion, they are introduced to the company and any relevant training that is required. We will also require them to provide personal data about themselves. This data will be of a sensitive nature and only provided to authorised management or members of staff that are required to have the information for booking any training that is required. No other member of staff has access to this information, and all personnel files are stored securely.

### 2.3 Details we hold of our business partners

Though we carry a lot of information about our business partners, most is generic to the business partner and not personal.

The personal details we may collect will be contact names, numbers and email addresses for specific personnel that has been given to us. We may also have details of their position within their business if this information has been provided.

### 2.4 Other information we hold

We may also have personal data in hard copy from customers which include job reports, certificates, application forms etc. once this information is no longer required it is shredded and destroyed and removed by a fully licensed waste carrier.

### **3 Communicating Privacy Information**

Without explicit prior consent from customer or business partner we do not use or pass on any personal data. Unless it is used only to carry out a service or supply of products requested, in which case all reasonable steps are taken to ensure the recipient of any such information is GDPR compliant. No information shall be given to third parties unless it is legally required, in this event we would require written notification from the relevant body to provide the information required.

### **4 Individual Rights**

Should any individual request for their data be removed from our system then we will comply within one calendar month of a written request, providing the details are not legally required to be retained. If this is the case the details will be retained for the minimum length of time legally required before being removed/destroyed. Once deleted, all personal information is removed from the system however addresses may remain as these are linked to products that we have supplied. We understand that everyone has the *"right to be forgotten"*, and their personal data deleted from our system if requested.

A printout may be issued with customer details, including but not limited to delivery notes and invoices. Once printed these documents will be sent by Elexion to the relevant person/company and are essential to the running of the business. Once sent Elexion can take no further responsibility for the information on these documents.

The personal information on these documents may include any of the following:

- Customer Name
- Contact Name
- Telephone Number/s
- Address(es)
- Email address

There will be no sensitive data included in these documents

### **5 Subject Access Requests**

We will process any request for the personal information held on any individual as quickly as we are able, but always within one month of the request. We do not require written requests for this information, but we would require the person asking for the information to verify themselves by asking some security questions relating to their account. We may refuse unfounded or excessive requests but will explain the reason for refusal and advise the customer of their rights to complain to the supervisory authority.

### **6 Lawful Basis for Processing Personal Data**

As per Art. 6 GDPR, Elexion fully adhere to the regulations in relation to the use of the personal data and reasons for processing and will continue to do so.

### **7 Consent**

As previously stated, we do not hold any sensitive data about our customers and the data we do hold has all been provided by them either verbally or electronically. We have a privacy policy in our terms and conditions we send to every customer which we ask they acknowledge in writing before we process any of their details.

### **8 Children**

Elexion do not hold or process any personal data of children.

### **9 Data Breaches**

The risk of a data breach is low following our internal risk assessment. If we should experience a breach, it will be reported to a senior member of staff immediately and will be investigated and reported to the ICO.

### **10 Data Protection by Design and Data Protection Impact Assessments**

Privacy impact assessments (PIAs) will be carried out when required, otherwise we will continue to monitor our privacy risks and update our processes where required

### **11 Data Protection officers**

Elexion Senior Management will ensure compliance with GDPR legislation.

### **12 International**

Elexion do not operate internationally