CUSTOMER/SUPPLIER PRIVACY POLICY

Data controller:

WEST COAST SEA PRODUCTS LTD, (WCSP LTD) DEE WALK, KIRKCUDBRIGHT DG6 4DQ

The organisation collects and processes personal data relating to its customers and suppliers to enable us to trade with you. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. The General Data protection regulation which came into force on 25th May 2018 ensures that we use your personal information only if we have a proper reason to do so. WCSP Ltd will never sell or pass on this information.

General Principles

- We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so
- We will be transparent in our dealings with you and will tell you about how we will collect and use your information
- If we have collected your information for a particular purpose we will not use it for anything else unless you have been informed and, where relevant, your permission obtained
- We will not ask for more information than we need for the purposes for which we are collecting it
- We will update our records when you inform us that your details have changed
- We will continue to review and assess the quality of our information
- We will implement and adhere to information retention policies relating to your information and will ensure that your information is securely disposed of at the end of the appropriate retention period
- We will observe the rights granted to you under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are promptly and transparently dealt with
- We will train our staff on their privacy obligations
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held

- We will ensure that when we outsource any processes we ensure the supplier has appropriate security measures in place and will contractually require them to comply with these Privacy Principles

What information does the organisation collect?

The organisation collects and processes a range of information about you. This may include:

- your name, address and contact details, including email address and telephone numbers
- contact names, telephone and fax numbers, email addresses for each department (sales/book keeping/transport etc.)
- details of your bank account; name of account; sort code; account number as supplied by you.
- VAT number
- Details of amounts invoiced and amounts outstanding
- CCTV images which may include images of visitors from your business to our sight

Data will be stored in a range of different places, including in the organisation's Sales management systems and in other internal and external organisations IT systems (including the organisation's email system).

Why does the organisation process personal data?

The organisation needs to process data to enter into a sales contract with you and to meet its obligations under your sales contract. For example, it needs to process your data to provide you with a sales contract, to receive monies from your account to pay for goods.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations.

Who has access to data?

Your information may be shared internally, including with members of the Sales and Purchases teams and IT staff if access to the data is necessary for performance of their roles.

How does the organisation protect data?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the organisation keep data?

We will only retain your personal data for as long is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the services provided;
- Any statutory or legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data;
- Whether the purpose of the processing could reasonably be fulfilled by other means.

Your rights

As a data subject, you have a number of rights. You can:

- submit a Subject Access Request. Under GDPR this is your right to request a copy of the information that we hold about you. Such requests must be in writing to the contact details provided in this policy. If we do hold any of your personal data we will respond in writing within one calendar month of your request.
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact **West Coast Sea Products Ltd, Dee Walk. Kirkcudbright. DG6 4DQ   Telephone 01557 330789**

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner. www.ico.org.uk

By visiting www.westcoastseaproducts.co.uk you are accepting and consenting to the practices described in this policy.