

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Designs for Lighting Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our standard terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation 2018 (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Designs for Lighting Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: 17 City Business Centre, Hyde Street, Winchester, SO23 7TA. Tel: 01962 855080; E-mail info@designsforlighting.co.uk. For all data matters contact the Office Manager on 01962 855080.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To deliver the services you have asked us to provide you in relation to any project
- To maintain contact and communication with you during the course of a potential or new project
- Processing of Orders and Payment of Invoices
- To maintain contact with you in a professional capacity within the field of lighting
- Sending of occasional mailshot and newsletter to inform you of news, events or activities
- To purchase goods, materials and services from you

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process your Personal data which may include your Name, Address, Phone Number, Email address, Company, Job Title, financial data for payments such as VAT and bank details

We have obtained your personal data from legitimate sources as follows:

- Incoming e-mails from you or to which you are cc'd
- Letters or other written correspondence
- Business Cards

Publicly Accessible Sources including:

- Trade Directories (Highway Electrical Yearbook etc)
- Company web-sites

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input checked="" type="checkbox"/> Consent of the data subject;	For example marketing activities including sending of newsletter, sending of customer satisfaction surveys.
<input checked="" type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	For example to contact clients and other stakeholders to discuss a project or potential project order, to provide services under the contract.
<input checked="" type="checkbox"/> Processing necessary for compliance with a legal obligation	for example VAT accounts, tax accounts
<input checked="" type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	For example targeted marketing to relevant clients or potential clients Maintaining contact in a professional capacity related to lighting

b) Special categories of personal data (article 9 of GDPR)

Our lawful basis for processing your special categories of data:

<input checked="" type="checkbox"/> Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	Staff: for reasons of Payroll, Pension contributions and dealings with HMRC
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<p>■ Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional</p>	<p>Staff specific health issues for use in an emergency situation to inform health care professionals</p>
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6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with Directors, HR, administrative and finance staff and contact details with the relevant project team members. Data may also be shared with Third Parties who we instruct to assist us in delivering the services that you have instructed us to provide.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary in order to comply with our obligations for accounting, legal or auditing or insurance purposes or to comply with the conditions of contract. For example, for accounting purposes we must keep data for 6 years.

8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so may have consequences in relation to the services that we can offer or communications.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not generally transmit data outside the EEA, unless on a project specific basis our client or supplier is a company based outside the EEA, in which case project team contact details may be shared with them for communication purposes only.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative on 01962 855080.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.