

Scope

This policy sets out how Cold Formed Products (CFP) collect and use personal data about you in compliance with the principles of the new General Data Protection Regulations (GDPR), which are in force from 25th May 2018, and how that applies to you, our supplier. These regulations replace the Data Protection Act 1998 (DPA).

Introduction

The GDPR is introduced because of the huge technological changes that have occurred over the past couple of decades, and it's necessary to have new legislation in place to adequately protect an individual's *personal data*.

CFP takes the privacy of our suppliers and the protection of data related to them very seriously. This Privacy Policy is intended to set out your rights and answer any queries you may have about your **personal data**. If you would like more clarification, do not hesitate to ask either Andrew Palmer or Julie Taylor

Key Definitions

These definitions may be used throughout this policy for consistency.

Personal Data: In short, Personal Data is information relating to living individuals who can be identified from that data directly or indirectly. This is any information relating to a living, identified or identifiable natural person, for example, a person's name, address, date of birth, next of kin etc.

Special Category Data: This is defined by the GDPR as personal data that is regarded as 'sensitive', as below:

- Racial or ethnic origin (CFP does NOT hold such data)
- Political opinions (CFP does NOT hold such data)
- Religious or philosophical beliefs (CFP does NOT hold such data)
- Trade union membership (CFP does NOT hold such data)
- Data concerning health (CFP does NOT hold such data)
- Data concerning sex life and sexual orientation (CFP does NOT hold such data)
- Genetic data (CFP does NOT hold such data)
- Biometric data, where it can identify you (CFP does NOT hold such data)

Data Subject: This is an *individual* (in this case a supplier contact) who is living and who the data is about. A business is not a natural person, so the GDPR only applies to "real people" and they are known as data subjects.

Data Controller: This is person who determines the purposes and means of processing personal data. The Data Controller at CFP is Andrew Palmer and is the person to whom you provide your consent for the processing of your personal data.

Data Processor: This is person who processes the data on behalf of the data controller. The data controller can also be a data processor. At CFP Julie Taylor is a data processor and Andrew Palmer is both a data controller *and* a data processor.

Data Processing: Data processing covers anything you do with an individual's data, e.g. obtain and store, adapt, alter, retrieve, manipulate etc

Policy Statement

The following 8 policy sections cover the principles of the GDPR and will provide you with the information you need to make you aware of what personal data we hold, how it is obtained, handled, used and safeguarded, and your rights.

1. What information do we collect and process?

As you are our supplier we may collect and process personal data about individuals within your company with whom we have contact.

The **Personal Data** we hold, and process may include:

- The contact names
- Email address (where this is provided to us) and/or phone number(s)
- Position and business activities within your company

We do not hold any **Special Category Data** on anyone in your company.

Essential and Non-Essential Data

CFP regards all the above data that we hold to be **essential** for us to conduct an effective customer-supplier business relationship with your company.

2. What is the source of this information?

We obtain(ed) personal data about you from the following sources:

- From you, our supplier
- From individual contacts

3. How do we use this information and what is the legal basis for this use?

We process the personal data for the following purposes, only in accordance with our legitimate interests:

- maintain an accurate record of our business activities with you
- to deal with administrative and legal matters
- to communicate effectively
- to ensure adherence to Company rules, policies and procedures
- to prevent and detect fraud and other wrongdoing
- to establish, exercise or defend our legal rights and to manage risk

4. With whom and where will we share your personal data?

We may share your personal data with:

- our customers
- third party service providers, such as subcontractors, who will process it on behalf of CFP
- our professional advisors such as our auditors and external legal and financial advisors.
- government authorities and/or law enforcement officials if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

CFP will never sell on or pass your data to any other third party or use it for any unsolicited campaign purposes.

5. How long will we keep your personal data?

We will not keep your personal information for longer than is necessary and will only retain the personal information that is necessary to fulfil our business relationship. We are also required to retain certain information by law or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

6. Where is data stored and how is it protected?

Storage:

The personal data that we collect from you is stored in two ways.

Vital data, essential for electronically processing day-to-day activities is stored on CFP electronic databases.

Passive data, such as documents and copies of documents, are electronically archived as PDFs (**P**ortable **D**ocument **F**ormat) on CFP electronic databases.

Data Security:

CFP Servers are firewall protected from outside attack.

Databases are backed up daily to remote, off-site data storage servers using end-to-end data encryption to prevent unauthorised access. Rollback backups are kept so that in the case of data corruption either at CFP or at the remote server location, say due to virus attack, a data recovery can be made.

Databases are also backed up to portable password-secured hard drives daily.

7. What are your rights in relation to your personal data?

Data that we currently hold on our databases is assumed to be already there with your consent.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right to view any personal data we hold about you.

8. Where can I find more information about CFP's handling of my data?

Should you have any queries regarding this Privacy Policy, about CFP's processing of your personal data or wish to exercise your rights you can contact the controller of data and IT at CFP, Andrew Palmer.