



Data Privacy Policy

Introduction: The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information for individuals within European Union (EU).

GDPR became effective on 25th May 2018. Unlike the Data Protection Act 1998, GDPR applies to the whole of EU. It is enforced by the Information Commissioners Office (ICO).

Personal information means information about a living individual that can identify them. It includes name, address, email, telephone number and other financial information.
We do not hold *sensitive data* or *criminal conviction* data unless authorised by you.

Our approach: The ability to provide our Clients and Suppliers with the reassurance that any data held by us is relevant, securely maintained and administered according to GDPR is a key business driver for us. So, it is our intention to comply with these new Regulations. We have conducted an appropriate Risk Assessment and acted upon the findings.

Data Protection Officer (DPO): Our DPO is Gareth Wall, Director.

Personal Information we hold may include some/all of the following:

Type of data	Description of data	Examples as to how we use that data
Contact information	Name Address Phone/email How to contact you	Service your products. Analysis and profiling. Client Relationship Management (CRM)
Transactional information.	Product information. Review/expiry date.	Servicing your products. Analysis and profiling.
Contractual information	Copies of current contracts between us &/or instructions requests from you.	Servicing your products.
Consent and preferences	Telephone. Email.	In-house Marketing. CRM.
Technical data	Details on devices and technology you use.	Servicing current products.
Open data and public records	Information about you that is openly available on the Internet or public sources.	Servicing your products. Legitimate interests. CRM.

We may process your personal data to comply with any legal obligation that falls upon us.

The top 5 causes of data breaches and how we intend to deal:

Phishing	<p><i>“Phishing” emails may be received requesting information or inviting a reply. Clicking on a reply may allow compromise our electronic records. Vigilance is required.</i></p> <p><i>Our Users are instructed to ignore/delete any emails that they suspect may be phishing.</i></p>
Loss or theft of corporate asset(s).	<p><i>Portable devices including laptops, tablets and mobile phones are encrypted and have passwords</i></p> <p><i>Screens are turned off and device put to sleep when left unattended, even for short periods.</i></p> <p><i>Devices are not left unattended in public places.</i></p> <p><i>Devices left in motor vehicles will be secreted out of sight and vehicle locked.</i></p>

External attack.	<i>Security protection and malware is installed across all IT equipment. This will be maintained and updated as required.</i>
Abuse by insider:	<i>Due to the size and nature of our business operations we do not expect this to be an issue in reality. The use of USB or memory sticks has a strict procedure and all memory devices are kept in a locked and fireproof safe.</i>
Inadvertent misuse by Insider:	<i>All Our Users have received training in compliance with GDPR. All Our Users are subject to ad hoc checks of their systems and hardware equipment. Audit trails are maintained to demonstrate a file's chain of custody. The Directors are able to revoke individual access to either all data or particular files and/or control data sharing within our Business. This can be achieved remotely if required.</i>

Transferring your data outside the EU: Any data held by Us is stored securely within the European Economic Area (EEA) and regularly backed up. Before we transfer any data outside the EEA we will take all reasonable steps to make sure your data is treated securely and in accordance with this policy.

Withdrawal of consent: You may withdraw consent for us to hold data at any time and/or to have data removed— *right to erasure*. You can do this by written request to:

Email: info@btms.co.uk
 Mail: BTMS (UK) Ltd
 Unit 2c Sewstern Industrial Estate
 Gunby Road
 Sewstern
 Grantham NG33 5RD. T: (01476) 593491

PLEASE NOTE: We are unable to accept verbal instructions to delete/amend data.

Copy of data held: You are entitled to see a copy of the personal data about you that we hold and to instruct us to change it if it is incorrect. Requests should be made as above. There is no charge for this and we intend to respond to requests within 1 calendar month of receiving the request. Our preferred method of response is Recorded Delivery post to your last notified address held on our records.

Removal of data: We will remove/delete data in the following circumstances:

- Where you have instructed us to do so.
- Which is time limited by law or legislation.
- When your account with us has been inactive for over 24 months.

We will only keep your data beyond this period if we have a legitimate reason to do so.

In good faith: We cannot be held liable for any loss or damage where we have acted in good faith on instructions purporting to be from you and where those instructions turn out to be fraudulent. We may, at our discretion, take reasonable steps to authenticate any instructions received before acting upon them but are not obliged to do so.

Breaches & Reporting: We intend to comply with relevant GDPR requirements.

Review: These arrangements will be periodically reviewed and updated by us.