



GCP 258	SUPPLIER PRIVACY POLICY
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Document History

Section	Changes made	Date
All	New Document	May 2018

Introduction

On 25 May 2018, a new European Union data protection law – the General Data Protection Regulation (GDPR) – takes effect. The GDPR gives individuals in the EU more control over how their data is used and places certain obligations on businesses that process information belonging to those individuals.

As a supplier to Cherwell Valley Silos Limited (“CVS”), you may have provided personal data which is covered by GDPR legislation. CVS needs and will continue to need to keep and process information about you for normal trading purposes. The information we will or do keep and process about you will be held confidentially, up and until, it is necessary to pass it to others. Some of this information could be personal data and this Privacy Policy sets out what personal information about you we will collect and how that information will be used.

What type of personal information we will collect and keep about you?

Supplier application documents	
References	
Name	
VAT number	
Individual email addresses	
Bank account details	If direct payment is your preferred method of payment
Addresses	
IP addresses	
Telephone/ Mobile numbers	
Emails sent by you and to you in the course of trade	
Information about you received from customers or suppliers	
Any other information that you choose to provide to us	

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A CCTV system monitors parts of our site. Images are recorded and retained for a limited period of time.

There are signs on our site showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (eg to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation.

The CCTV is primarily for security purposes, although in rare cases we may use CCTV footage in investigations into allegations of misconduct, for example if a fight or vandalism is alleged to have taken place on the site.

Within the Valley Transport division other data is also held. An example of this type of data would be in-cab cameras.

How will we use your personal information?

CVS collects personal information in order to perform specific purposes as follows:

1. To maintain our relationship with you whilst you are a supplier
2. To process orders and receive agreed goods and services from you
3. To make payments to you
4. Administering our purchase ledger
5. To communicate with you, including to respond to information requests/enquiries submitted
6. For record keeping and internal reporting
7. To investigate any complaint you make

Sharing your personal information with third parties

We will share your personal information with the following third parties:

1. HM Revenue & Customs
2. NatWest Bank for the purposes of processing payments
3. Insurance companies but only in circumstances involving or concerning your business
4. Our auditors, solicitors or similar advisers
5. Investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to CVS
6. Insurance companies but only in circumstances involving or concerning your business
7. Various external auditors of CVS
8. To contractors who carry out work on our behalf
9. From time to time we may give contact details to potential suppliers requesting references
10. To other third parties at your request

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It may be necessary to share your information for other specific purposes, for example, where health and safety, or that of others, is at risk; to prevent or help investigate crime; to Occupational Health services; to Local and central government bodies, such as Local Councils; to Emergency services - such as the Police, and Fire and Rescue Service.

We do not share information with third parties for marketing purposes.

We will not disclose personal information about you to third parties in situations not listed above unless we are required to do so by the laws of England and Wales, or we have your permission to do so.

How will your information be kept secure?

In order to ensure that your information is used appropriately and that your privacy is respected, your personal information will be held and used in compliance with the requirements of all applicable legislation. This means that:

1. CVS will take steps to ensure that your information is kept as safe and secure as possible, and that it is always accurate and up to date;
2. Only those staff who need it will have access to your personal information;
3. Your records will be retained in accordance with CVS Quality Management System

This information will be either kept securely either electronically or in lockable cabinets.

Data retention

The personal data we hold will be kept throughout a customer's period of trading with CVS, and will be subject to the company's archiving policy.

Data will be held for up to 8 years after a customer ceases to trade with CVS, with the exception of data within our sage software package as this software has no facility to archive dormant accounts.

Lawful basis

We hold data to facilitate the fulfilment of our contract with you, or because we have a legitimate interest to process your data for business purposes.

These two different bases are set out in the GDPR as follows:

1. Article 6 (1) b). Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
2. Article 6 (1) f) Processing is necessary for the purposes of the legitimate interests pursued by CVS

Processing of personal information within the UK

All personal information shall be held and used in the United Kingdom of Great Britain and Northern Ireland.

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What are your rights?

In addition to having the right to be informed about how we will use your information, you have the right to the following;

1. access to personal information we hold about you;
2. to have your information corrected if there are inaccuracies or if the information is incomplete;
3. to restrict the processing of your information in certain circumstances in accordance with applicable law;
4. in some instances, to object to your personal information being used at all due to special grounds relating to your “particular situation”.
5. The right to erasure if there is no compelling reason for us to keep it
6. to be told if your personal information is lost and if as a result, your privacy and rights maybe at risk or compromised.

In addition to the above, if we have no legal basis to process your information other than the fact that you have given us your consent, then you have the following additional rights:

1. to withdraw your consent to process your information;
2. in some instances, to ask for your personal information to be sent to another organisation in a suitable format.
3. to withhold permission for your information to be shared.

You have the right to lodge a complaint to the Information Commissioners’ Office if you believe that we have not complied with the requirements of the GDPR with regard to your personal information.

It may be necessary for us to restrict access to certain information if that information reveals personal information relating to another person or persons, unless that information can be redacted sufficiently to ensure the anonymity of that person or persons.

Automated Decision Making

We will not use automated decision making processes in respect of your personal information

Who can I contact with any questions or complaints?

If you wish to see the information we hold or if you believe that any information we hold is out of date or inaccurate or have any concerns about how your personal information is processed, or if you have additional information that should be provided, please speak to your accounts department contact in the first instance.

If the matter is not resolved to your satisfaction by your accounts department contact, you should contact the CVS Finance Director.

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The right to complain

You also have the right to appeal to the Office of the Information Commissioner which is the UK supervisory authority for data protection issues.

Contact details:

Telephone number 0303 123 1113

Website: www.ico.gov.uk

The CVS Data Protection Policy is available on request and on the Company website at www.cvs-ltd.com

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