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General Data Protection Regulation (GDPR and Data Protection Act 2018 (DPA)) 18

Privacy Notice

On the 25th of May 2018 there is new legislation (GDPR) coming into effect that requires all contact with customers to be authorised by the individual. We are committed to treating your Personal Data carefully and responsibly and by replying to this email you are notifying us that you wish us to keep your records on file for the reasons of commerce between us.

1) Who are we?

Echo Engineering (southern) Ltd Chapel Land Farm Ashford Road New Romney Kent TN28 8TH

2) When might we collect your personal Data

- When you visit our website;
- When you buy products or services from us over the phone;
- When you send us an enquiry by email or by post;
- When any of our suppliers or business partners share your information with us;
- If you have contacted us asking for information about any of our products or services;
- If you have replied to any of our emailed sales brochures;
- If we need to collect your personal data for legal reasons.

3) What type of personal data we collect

We will only ever ask for information that we need and is relevant. The Personal data we might ask for includes:

- Your name, address, date of birth, email address and telephone number:
- Bank Details of suppliers. All payments are made by BACS
- Details of any credit check that we might have made before deciding whether to offer you credit;
- Written notes of telephone conversations either on computer or on paper.
- We may also record any complaints you might have when you contact us;









Company Reg No. 3389027 VAT Reg No. 571 7225 40 Registered office: As above. Registered in England & Wales

4) Why do we need your personal data?

To be able to provide you with the products and services that you need and maintain our relationship with you, we might need to store or process the personal data you have provided us with. We may also have to pass your data to one of our business partners so that they can help us to provide you with the goods and services you have asked for. Your personal data will only ever be used for the purposes of customer management or marketing to the appropriate degree.

We will neither sell, market nor disclose your data in any other way to third parties. If we do have to use the services of third parties, we will make sure that they have security measures in place to keep your data safe.

The sorts of people we might have to share your personal data with include:

- Delivery couriers and postal firms
- IT companies who support our systems and website
- Sub-contractors who might act on our behalf and help us provide the service to you.
- Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;

Where we do share your data, we would only provide the information that is needed for the specific purpose and the third party would only be able to use your data for that purpose. The third party will be people we trust to ensure that your privacy is respected always, and they will be contractually obliged to keep your data safe.

We may also pass your data to third parties where we have a legal obligation to share information such as with the police or other regulatory or Government bodies.

5) The legal reasons for collecting your personal data

We will only collect your personal data if we have a legal reason for doing so. This might be one or more of the following:

- Consent This is where you have consented to us having your personal data. You might have agreed that we can send information such as details of our products or services. If you have consented, we may send you personalised information about products and services that we think you may be interested in based on orders you have placed in the past. You can at any time change your mind and tell us that you no longer want to hear from us or that you wish to change the way you receive information from us.
- **Compliance** In order to comply with legal requirements such as health and safety laws or tax laws, we may need to collect and process your data.
- **Contractual obligations** If we have a contract with you we will need to collect and process your personal details so that we can fulfil our contract
- **Legitimate interest** this is where we might use your personal data to meet reasonable business interest if we are not significantly impacting your rights. We might send you information about any of our products or services that we think you might be interested in

6) How we keep your personal data safe

We will always treat your personal data with respect and care. All our employees have been briefed on the data protection laws and are contractually obliged to protect your personal data. We will make sure that all our suppliers and business partners have a contractual requirement to protect your personal data.

We will never keep your personal data for any longer than we need to.

7) Security

Below is a summary of how Echo Engineering (Southern) Ltd protects its own data and that of its clients.

• Servers – On Site Storage/Cloud Backup

All data Echo Engineering (Southern) Ltd receives and produces is securely stored on fully encrypted storage devices.

The data held on these devices is backed up to a secure UK data centre overnight to provide an off-site copy for disaster recovery purposes.

All data is held encrypted at all times, including in transit to the data centre.

Backup to the cloud encrypts our data at source using AES-256 encryption before sending it over a TLS/SSL secure connection to a secure data centre located in London, UK. All aspects of our data is secure at any given time. Xenace Data Centres are SSAE-16 certified, which is among the highest standards in the industry for data centre security.

Every folder and subfolder on our storage devices has set permissions; so only certain people within the company can access that data. Access is recorded and granted through the Director.

• Office 365 Email

All Echo Engineering (Southern) Ltd email is stored in Office 365.

Details on how Microsoft protect our email in Office 365 can be found at the following web address:

 $\underline{https://products.office.com/en-us/business/office-365-trust-center-top-10-trust-tenets-\\ \underline{cloud-security-and-privacy}$

• Managed IT Support

Echo Engineering (Southern) Ltd's IT network and devices are serviced through a contract with:

Xenace Ltd, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ – 0333 444 4402 Xenace are a Microsoft Partner, Cyber Essentials Plus certified and are members of the Cyber Security Information Sharing Partnership (https://www.ncsc.gov.uk/cisp) Xenace provide us with fully managed IT Support as well as 24/7 monitoring of our devices and network.

Should there be a requirement to take personal data off site, this will be on an encrypted device.

However, please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

8) Your rights

You have the right to copies of any personal data we hold about you and as far as we can, we will provide this in an easy to understand format. We may not be able to do this if the data has been received from a third party or it is in a technical format that does not translate. If the data is incorrect or incomplete you can ask us to correct it. If you ask us to do this, we will need to ask you to verify your identity before we can make the changes or supply any information to you.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if necessary considering the complexity and number of requests that you have submitted.

If you have any queries: please do not hesitate to contact us.

Mr. David Faulkner

Email- accounts@echo-eng.com

We may make minor changes to this Privacy Policy. When we make these changes, we will publish the updated policy. If we make any significant changes, we will take additional steps to inform you of these.