

# SPLENDID

## PRIVACY & FAIR PROCESSING NOTICE FOR SPLENDID.CO.UK LIMITED

Splendid.co.uk Limited, a company registered in England and Wales with the company number 03841043 and with its registered office at Ground Floor, 68 South Lambeth Road, London, SW8 1RL (“[Splendid](#)”) strives to protect the privacy of all personally identifiable information collected during the course of our activities and it is important for you to know how we process your data. We will process your personal information under the terms of this notice and in accordance with any agreement with you.

We are a “data controller” in terms under data protection laws (including from 25 May 2018, the EU General Data Protection Regulation 2016 and the Data Protection Act 2018) (“[Data Protection Laws](#)”).

We need to process personal data relating to our suppliers and customers in order to function effectively as a business, ensure good governance, for audit purposes, to perform our business and to enable us to meet our legal obligations.

Personal data is processed for commercial, administrative and statutory purposes. All such personal data is collected and held in accordance with all applicable Data Protection Laws.

### WHAT PERSONAL INFORMATION WILL SPLENDID USE?

This list includes all the ways we may use your personal information, and which of the reasons we rely on to do so. This is where we tell you what our legitimate interests are.

PERSONAL INFORMATION WE MAY PROCESS	OUR REASONS FOR PROCESSING	OUR LEGITIMATE INTERESTS
<u>Suppliers</u> • Names, addresses and other contact details of supplier personnel	• Fulfilling contracts	
	• Our legitimate interests	• To keep in contact with suppliers • Administering our business
<u>Customers</u> • Names • Addresses • Contact details • Any miscellaneous personal data contained within email communications	• Fulfilling contracts • Consent	

## WHERE DO WE OBTAIN YOUR INFORMATION?

In most cases we will obtain this information from you directly.

## PROCESSING CONDITIONS

We process the personal data referred to above for the purposes of any contract or potential contract with our suppliers and customers; or for our legitimate interests in order to function effectively as a business, to ensure good governance, for audit purposes, to perform our business activities; and to enable us to meet our legal obligations that we may be subject to.

## WHO DO WE SHARE YOUR INFORMATION WITH?

The information you provide to us may be accessed by our staff, our auditors, our professional advisors and carefully selected third parties in the course of providing services to us under suitable obligations of confidentiality, such as training providers, credit reference agencies, debt collection and tracing agencies.

## SECURITY

We employ administrative, electronic and physical security measures to ensure that the information that we collect about you is protected from access by unauthorised persons and protected against unlawful processing, accidental loss, destruction and damage.

Please be aware that unfortunately the transmission of information via the internet or by email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the data transmitted to us and any transmission is at your own risk.

## THE PERIOD FOR WHICH THE PERSONAL DATA WILL BE PROCESSED

We will retain personal data securely and only in line with how long it is necessary to keep for the purposes or for a legitimate and lawful reason.

Our typical retention periods are as follows:

PERSONAL DATA HELD WITHIN:	RETENTION PERIOD:
Supplier contracts and documentation	7 years from the expiry or termination of the contract
Customer contracts and documentation	7 years from the expiry or termination of the contract

Some personal data may be retained for longer where it is in our legitimate interest to do so, such as to protect and defend our legal rights; or for research, archiving or statistical purposes. Individuals can request that other information relating to them be erased and we will deal with such requests in accordance with the law.

## TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

We do not typically send your data outside the European Economic Area ('EEA'). However, if we do so we will put protections in place to ensure the recipient protects the data to the same standard as the EEA. The protections include:

- transferring to a non-EEA country with privacy laws that give the same protection as the EEA; • putting in place a contract with the recipient that means they must protect personal data to the same standards as in the EEA;
- transfer personal data to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for personal data sent between the US and EU countries which makes sure standards are similar to what is used within the EEA.

## **DATA SUBJECT'S RIGHTS**

As an individual, you have the following rights as a data subject under applicable Data Protection Laws in relation to the processing of your personal data:

- The right to request from us access to information held about you - (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- The right to request that inaccurate data held about you is rectified - this enables you to have any incomplete or inaccurate information we hold about you corrected.
- The right to request the erasure of personal data - this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- The right to restriction of processing - this enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- The right to object to processing - objection to processing of your personal information can occur where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes; and
- The right to data portability.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Privacy Manager in writing.

Where we process your personal data based upon your consent, you have the right to withdraw your consent at any time.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

For more information and guidance about any of these rights please go to the website of the Information Commissioner's Office at <https://ico.org.uk/>.

## **COMPLAINTS**

If you think there is an issue in the way in which we handle your personal data, you have a right to raise a complaint with the Information Commissioner's Office. Their website contains details of how to make a complaint. However, we request that you contact our Data Privacy Manager in the first instance so that we have an opportunity to deal with your complaint.

## **CHANGES TO THIS PRIVACY & FAIR PROCESSING NOTICE**

We keep our Privacy & Fair Processing Notice under regular review and reserve the right to update and amend it. This notice was last updated on 25 May 2018.

## **FURTHER INFORMATION**

For further information about the proposed data sharing set out in this notice, or about any aspect of Splendid's processing of your personal data, please contact our Data Privacy Manager:

### **NICK WEBBER**

GDPROfficer@splendid.co.uk

Splendid.co.uk Limited – ICO registration number Z2888288