

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Gwe Cambrian Web Cyf ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Gwe Cambrian Web Cyf is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Aberystwyth Business Hub, 21 Bridge Street, Aberystwyth, Ceredigion, SY23 1PZ, 01970 623906, info@cambrianweb.com. For all data matters contact Kerry Ferguson on info@cambrianweb.com or 01970 623906.

This privacy notice applies to current and former clients. This notice does not form part of any contract to provide services, and we may update this notice from time to time. Please take the time to read this notice along with any other privacy notices we may provide on specific occasions when we are collecting and processing information about you.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- Contractual: where processing your data is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- Legal obligations: where the processing of your personal data is necessary for us, and you, to comply with the law
- Consent: where clear consent has been given by yourself for Gwe Cambrian Web Cyf to process your personal data for marketing purposes.

We will only ever use your personal data for the purposes of fulfilling contracts and legal obligations (for example sending invoices). If you have clearly opted into our mailing list, we will use your personal data to send marketing information.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data: name, registered business address (which may be your home address), contact information including email address and telephone number, company registration number where applicable.

We have obtained your personal data for the purpose of contractual and legal purposes as specified above. We have not obtained any data via online sources or purchasing from 3rd parties.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	For marketing purposes, consent will always be required. We use MailChimp for our marketing, who are a fully GDPR compliant company.
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Where we have been instructed to carry out a service for you
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	Where we are required by law to process your personal data, for example, finance.

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with, where required, our accountant, with whom we have a processor agreement in place.

Gwe Cambrian Web Cyf will not share your information for marketing purposes with any third parties. All and any information we hold will only be processed by our staff in the United Kingdom. We will only ever share your information with third parties if required to do so by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary in order to fulfil the purposes it was collected for. Examples include: in case of any legal claims/complaints; for safeguarding purposes etc.

Please view our Data Retention policy for further information.

8. Providing us with your personal data

We require your personal data as it is a contractual and legal requirement or a requirement necessary to enter into a contract.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for our processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside of the EEA, however please be aware that we do store information on a cloud-based system whose servers are located outside of the EU. We only use companies that are GDPR compliant, and request you contact us to discuss and have a copy of these companies' privacy policies.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Data Security

We have put in place appropriate and reasonable security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those employees, agents and contractors who have a business need to know. They will only process your personal data on our instruction, and as per our agreement with them, and they are subject to a duty of confidentiality.

We have in place a mobile device policy for any employees of Gwe Cambrian Web Cyf who use their own, or are providing with, a mobile device (smartphone or tablet). You can request this policy by contacting Kerry Ferguson on 01970 623906 or info@Cambrianweb.com.

13. Data Breach

In the event of a data breach, it is our responsibility to inform the ICO, the police and the individuals whom will be affected. We have a data breach policy in place which you can read by request.

14. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

15. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

16. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact Kerry Ferguson, Director at Gwe Cambrian Web Cyf on info@cambrianweb.com, 01970 623906 or by post at Aberystwyth Business Hub, 21 Bridge Street, Aberystwyth, Ceredigion, SY23 1PZ.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.