

BEMODERN LIMITED:

FAIR PROCESSING NOTICE

(CUSTOMER DATA)

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1. ABOUT THIS DOCUMENT

- 1.1 During the course of our activities we, Bemodern Limited, will process personal data (which may be held on paper, electronically, or otherwise) we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA)/GDPR. The purpose of this notice is to make you aware of how we will handle your personal data.

2. DATA PROTECTION PRINCIPLES

- 2.1 We will comply with the six data protection principles, in Article 5 of the GDPR requires that personal data must be:

a) processed lawfully, fairly and in a transparent manner in relation to individuals;

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.”

2.2 "Personal data" means recorded information we hold about you from which you can be identified. It may include: Your name, Your Address Telephone & e-mail addresses, other personal information.

2.3 "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

3. FAIR AND LAWFUL PROCESSING

We will usually only process your personal data where you have given your consent to Bemodern Ltd directly, or you have given consent to a third party, who have then requested Bemodern Ltd to deliver your ordered items directly to you, Via our Home-delivery service, or where the processing is necessary to comply with our legal obligations.

4. HOW WE ARE LIKELY TO USE YOUR PERSONAL DATA

4.1 We will process your data solely for the purpose of payment and delivery of items ordered directly or indirectly. We will not use your data for any marketing purposes or sell any of your data to any third parties. We will keep your name and address and details of items ordered for warranty purposes only

5. PROCESSING FOR LIMITED PURPOSES

We will only process your personal data for the specific purpose or purposes notified to you or for any other purposes specifically permitted by the DPA/GDPR.

6. ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

7. ACCURATE DATA

We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

8. DATA RETENTION

We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer

required. For guidance on how long certain data is likely to be kept before being destroyed, contact: Mr. David M Butler, by Email: David.butler@bemodern.co.uk

9. PROCESSING IN LINE WITH YOUR RIGHTS

You have the right to:

- (a) Request access to any personal data we hold about you.
- (b) Prevent the processing of your data for direct-marketing purposes.
- (c) Ask to have inaccurate data held about you amended.
- (d) Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- (e) Object to any decision that significantly affects you being taken solely by a computer or other automated process.

10. DATA SECURITY

10.1 We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

10.2 We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.

10.3 Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

11. PROVIDING INFORMATION TO THIRD PARTIES

We use third parties to carry out certain activities on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail packages, processing credit card payments, Engineers providing warranty and aftersales services. These third parties have access to personal information needed to perform their functions, but may not use it for other purposes.

12. SUBJECT ACCESS REQUESTS

If you wish to know what personal data we hold about you, you must make the request in writing. All such written requests should be forwarded to: Mr David M Butler, Data Protection Representative, Bemodern Ltd. On the attached form and the address indicated.

Bemodern Ltd: - Subject Access Request Form

1. Are you/were you employed by Bemodern Ltd Yes No (if No go to Q4)

2. Date left employment __ / __ / ____ (dd/mm/yyyy) : Still Employed Yes

3. If you are/were employed by Bemodern Ltd what position do/did you hold?

4. Please provide the details of the person requesting the information:

Full Name: _____

Address: _____

Telephone Number: _____

Email: _____

5. Are you the Data Subject? Yes No

6. If you are the Data Subject, please provide the following:

6.1. driving licence or passport or other document showing name and signature;

6.2. a recent bill (e.g. credit card bill, bank statement or utility bill) or insurance document showing name and address; and

6.3. a stamped, addressed envelope for return of proof of authority documents.

7. If you are not the Data Subject please provide full details of you and the Data Subject:

Data Subject Name _____

Your Full Name: _____

Address: _____

Telephone Number: _____

Email: _____

8. If you are not the Data Subject please provide:

8.1. proof that the Data Subject has authorised you to request data on their behalf. A signed letter authorising you to act on behalf of the Data Subject will be sufficient;

8.2. if you have parental responsibility for a member and you are asking for information about that member:

8.2.1. evidence of your identity; and

- 8.2.2. if requested, evidence that you have parental responsibility for that member; and
- 8.3. a stamped, addressed envelope for return of proof of authority documents.

Scope of Request

9. Please provide a description of the personal data you are requesting and any information you have as to the location of the data. For example, the department or office of Bemodern Ltd relevant to your request.

Locating the Personal Data

10. If you would like a more general search, please note that we would normally search our supplier database if you are a supplier and our Finance Office, Personnel Files and Payroll Department if you are an employee of Bemodern Ltd. If there are any other files which you believe we should search, please advise.

Declaration

I certify that the information given on this Subject Access Request form is true and that Bemodern Ltd may contact me in order to obtain further details about the information requested if this is required.

Signed:.....

Full name:.....

Date:.....

Where to send your request

Please send this completed form to: Mr David M Butler, Data Protection Representative, Bemodern Limited, 19/34 Bedes Way, Bede Ind Est, Jarrow, Tyne & Wear, NE32 3BE.

When will I receive a response?

A response will be sent to you within the statutory time limit of one month.