

GDPR

We may hold and retain personal data on individuals for ONLY 3 reasons

REASON 1

You have purchased something from us or been involved in a transaction with us of some type either directly or through one of our trading platforms

REASON 2

You are part of our marketing database and have knowingly opted-in by a GDPR compliant method

REASON 3

You are a Spiratronics employee

From May 25th 2018, new GDPR legislation becomes active which changes how we acquire, handle, store, use and dispose of personal data. This document sets out our policy and commitment for each of the above scenarios.

You have purchased something from us or have been involved in a transaction of some type

...from May 25th 2018, the following policy applies to the way in which we will treat your personal data if you have been involved in a transaction with us

- 1 The only data we will collect from you and store will be data critical to fulfilling our side of your transaction. This will be no more than (but not necessarily all of) Name (including any applicable username), Address (including company name if applicable), Telephone Number and Email Address
- 2 By default, this data will be stored for a period of 12 months to enable us to (a) complete and service your transaction effectively (for example fulfil returns and warranty)
- 3 By default, for a further 60 months we will hold a 'light'-version of data to allow us to comply with UK tax laws which state that we must hold financial records for 6 years. This 'light' version of data will just include basic information (name and address).
- 4 The physical storage of the data and the destruction will comply fully with GDPR legislation and is outlined later in this document.
- 5 In providing us with information enabling us to complete your transaction, you WILL NOT automatically be added to any mailing list. You will have the option to receive mailing from us but ONLY by OPTING IN
- 6 At ANY TIME, you are entitled to request from us visibility of exactly what data we hold about you. Including information on how and where it is held and for what reason. You will not be charged or penalised in any way for requesting this information from us and your request will be actioned within 1 month
- 7 At ANY TIME, you may request that we remove ANY and ALL data we hold about you. Providing we are still complying with the law, we will remove the requested data within one month of your request
- 8 We will NEVER share your data with any third party.

If you are part of our marketing database...

...from May 25th 2018, the following policy applies to the way in which we will treat your personal data in respect to email marketing

- 1 You will **ONLY** be included on our email marketing list if you explicitly opted in. Our opt-in procedure will be and remain fully GDPR compliant
- 2 Our email marketing list will only hold the following personal information. (i) name, (ii) email address (iii) how you opted in (iv) when you opted in.
- 3 The physical storage of the data and its eventual destruction will comply fully with GDPR legislation and is outlined later in this document.
- 4 We will **NEVER** send you more than one marketing email per month
- 5 At **ANY TIME**, you are entitled to request from us visibility of exactly what data we hold about you. Including information on how and where it is held and for what reason. You will not be charged or penalised in any way for requesting this information from us and your request will be actioned within 1 month
- 6 At **ANY TIME**, you may request that we remove **ANY** or **ALL** data we hold about you. You can either do this by opting out of the mailing list (at which time we will automatically remove your data) or by contacting us directly
- 7 Your data and opt-in may be managed by a third party software solution. If this is the case, we will **ALWAYS** make sure that the provider we use complies fully with GDPR
- 8 We will **NEVER** share your data with any third party.

General notes on the holding of data...

...from May 25th 2018, the following points refer to the general way in which we will treat personal data

- 1 All of our stored data will be held securely. When it is held in any type of cloud storage, it will always be GDPR compliant.
- 2 We will only hold printed copies of data when it is absolutely unavoidable. In that case, any printed or written data will always be held in a secure, locked place
- 3 Any local computer holding personal data will be physically secure and password protected
- 4 All employees of Spiratronics will be fully trained on GDPR and this policy, regardless of whether or not their job role requires them to handle data
- 5 Any individual who we hold data about will have the right to erasure for which we have a process in place which will be actioned as promptly as possible and in all cases less than one month from date of request
- 6 Any security breach or suspected security breach will be informed to relevant individuals or organisations within 72 hours of them occurring.
- 7 This policy is applicable to Spiratronics and its sub-brand (Lemon Electronics). It will apply in the future to these businesses and brands regardless of any change of ownership.