



Delstree Privacy Policy & GDPR Governance Procedures

This document sets out the procedures to be carried out by persons in the employment (on a full-time, part-time or other specified contract) of Delstree Limited, with regard to GDPR and the processing of personal data.

As a software house we will ensure all processing of personal data, whether data is pertaining specifically to Delstree Limited, or for a third party (for example a customer of Delstree Limited, but not limited to this), will be processed in accordance with GDPR regulations.

Any copies of raw data (for example; excel spreadsheets, csv formatted file, but not limited to this) will be stored for only the required amount of time that is necessary to carry out the work.

Any data files will be deleted/removed from any Delstree file systems (be these on laptops, PCs or servers) , once a project is completed. Online backups are set to remove backed up files that have been deleted after 30 days of being deleted from the relevant machine.

Delstree will ensure that all software developed is designed to be GDPR compliant. This will include the encryption of personal data and default settings will stop backups of raw data files from being stored on PCs/servers/file systems. Where integration with third party applications has specific GDPR requirements they will be adhered to.

All printed versions/copies of any personal data (whether from third parties or specific to Delstree Limited) will be shredded once the requirement for their use is complete. Except for copies required for the purposes of complying with HMRC.

Main areas that Delstree Limited will apply GDPR Governance:

- Ensure files that contain raw personal data are only kept for the maximum scope of a project.
- Any copies of files that contain personal data will be deleted.
- A single location will be used to hold/store all personal data from third parties. This will ensure that it is easier to police what data should and should not be deleted.
- A monthly check of file systems will be done to check for old data files, containing personal data, that may have been used on historic projects.
- Paper copies of personal data will be shredded.



What Personal Data We collect

- Your name and position in a company
- Your contact details: postal address, billing address and despatch address (if different), telephone numbers (including mobile number) and e-mail address
- Purchases and orders made by you
- Marketing and communication preferences

How We Use Your Personal Information

We use personal information about you for the following purposes:

- When processing your order or contact query
- Providing information about our products which can be personalised based on the information we have collected about you
- To verify your Identity
- For crime and fraud prevention, detection and related purposes

Security of Your Data

We follow a tight security procedure as required under UK Data Protection Legislation (the Data Protection Act 1998) and in future Article 32(1) GDPR to protect the information that we store about you from unauthorised access. Our secure payment is via the highly respected and secure Stripe online payment system and information between you and us is 256 bit encrypted. We perform daily malware scans and restrict data access and have an internal confidentiality policy as follows:

Within Delstree Ltd we protect your privacy in 4 ways:

1. Access to customer account information is limited to those who need access for the performance of their job
2. We use full login and password controls on our sales control system
3. All full and part-time employees are required to sign a confidentiality clause as part of their terms of employment with the company
4. Confidentiality and database access controls are reviewed periodically and updated as required to further protect your personal data

3rd Party Data Access

Delstree Limited does not share any data with 3rd parties.

T 024 7632 8151
E info@delstree.com
W www.delstree.com

Registered in England
Registration Number: **05851555**

VAT Number: **989 4834 40**



Your Rights

If, for any reason, you are unsure about the personal and account information we are holding in your name, please contact our customer service team. They will happily review your file and update the records if required whether this is simply updating incorrect or out-of-date information or opting out of communications. You can contact our customer service team by email or phone.

Right of Access – in accordance with Article 15 GDPR, you are entitled to obtain information, free of charge, about your saved data, where applicable, has a right to the correction, blocking, deleting of data (Article 5 (1 d), e) Article 12 and 17-19 GDPR). On Request Delstree shall inform the user in line with Valid Law in Writing of the User's personal data (after appropriate security check to prove identity) we have saved. To request information that we may hold on you please email info@delstree.co.uk with the subject line "Right of Access Request". We will have one month (unless complex this can then be extended for 2 months) to respond to your request and will provide it in a common electronic format (CSV)

Right to lodge a complaint – In accordance to Article 77 GDPR. You have the right to complain to a supervisory body if you feel your data is being misused. Contact the ICO (Information Commissioners Office) for more information. We would hope that you would discuss with us any concerns so that we could look to rectify before it gets this far.

Right to Data Portability – In accordance to article 20 GDPR. You have the right to receive the personal data concerning yourself which you have provided to Delstree as the data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Right to be Forgotten – In accordance with Article 17 GDPR, you have a right for your data to be forgotten and erased (anonymised personal data) from our systems. if you would like this to happen please email info@delstree.co.uk with the Subject Line "Right to be Forgotten Request". We will need to confirm your identity before doing this and we will be extremely sorry to see you go. Please note under some circumstances we may be able to refuse this request for example the HMRC requires companies to keep records of VAT for up to 6 years.

Please note that the data cleansing process is total and we will have no records of your previous interaction. This is specific interest to rules following the Right to be Forgotten, which in turn may mean that we can legally acquire your data from opted in sources at a later date with no knowledge that you were once previous customer.

Please note, as advised by the ICO an Audit log comprising of just a name, plus the date the request came in, is kept for any access requests. A name on its own is not classed as personal identifiable information.



Legal Basis for Delstree processing Customer Data

General

Delstree Collects and uses customers' personal data because it is necessary for the purposes of complying with our duties and exercising our rights under a contract for the sale of goods to a customer; or complying with our legal obligations. In general, we only rely on our legitimate interest or permission (e.g. when you tick a box to receive our Newsletters) as a legal basis for processing in relation to sending direct marketing communications to customers via post, email or text messages. Customers have the right to withdraw consent at any time. Where consent is the only legal basis for processing we will cease to process data after consent is withdrawn.

Our Legitimate Interests

It is necessary for the legitimate interests of Delstree to process customer data as follows:

- Selling and supplying goods and services to our customers
- Protecting customers, employees and other individuals and maintaining their safety, health and welfare
- Promoting, marketing and advertising our products and services
- Personalising communications or content within emails and onsite
- Complying with legal and regulatory obligations
- Preventing, Investigating and detecting crime, fraud, or anti-social behavior and prosecuting offenders, including working with law enforcement agencies
- Protecting delstree, its customers, suppliers and employees, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Delstree fulfilling our duties to our customers, colleagues, shareholders and other stakeholders

Transferring Your Information Outside of Europe

We do not transfer any data outside of Europe



Data Retention Policy

Any information relating to your account (including order history, communications and correspondence records) is kept while you are still an active customer. If you have not bought within 6 years all data will be safely destroyed. We hold very little paper records but any relevant materials will be shredded. Electronic data sets will be deleted or anonymised from master sources and backups. An automated process to identify, alert and process these deletions is in place.

Please note that the data cleansing process is total and we will have no records of your previous interaction. This is specific interest to rules following the Right to be Forgotten, which in turn may mean that we can legally acquire your data from opted in sources at a later date with no knowledge that you were once previous customer.

Person responsible for Data Protection Compliance:

Derek Hateley (**managing director**)

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