

Positive ID Labels GDPR Privacy Policy

Date: 25 May 2018

The following statement of terms defines the policy we enforce to be a General Data Protection Regulations (GDPR) compliant organisation.

1. Data Controller:
 - a. LM Blasting Ltd trading as Positive ID Labels, Castle Lane, Melbourne, Derby, DE73 8JB
2. Data Processor:
 - a. LM Blasting Ltd trading as Positive ID Labels, Castle Lane, Melbourne, Derby, DE73 8JB
3. Classification of Personal Data:
 - a. We operate as a Business to Business enterprise and generally, when You contact Us through any medium, You will represent a company.
 - i. If You are acting on behalf of a company, We will retain only personal information that allows us to contact You as a representative of that company (i.e. Your company contact details) or information pertaining to another officer or representative of the company You have provided.
 - ii. Where You contact us as a representative of the company, We will treat only Your name as the personal data that We hold, all other data will be regarded as that of the company You are representing (including phone numbers, emails, contact addresses etc.) unless specifically stated as personal data by You.
 - b. In the event that You contact us as an individual representing Yourself, all of the data You provide will be classified as personal data.
4. Sources of Personal (and non-personal) Data:
 - a. We may obtain personal data that You provide to Us via:
 - i. Forms on our Website(s)
 - ii. Via telephone conversation
 - iii. Via correspondence (physical or electronic)
 - iv. Verbally in person

5. Storage of Personal (and non-personal) Data:

- a. We will generally securely store the personal data provided in the appropriate medium or system or format in which it was provided e.g.
 - i. Web based communications not limited to contact forms, email or chat systems are stored electronically.
 - ii. Or We will transcribe it aurally or from a physical source into our computer based order management and accounting systems
 - iii. In physical form
- b. Any personal data held in a physical form will be securely destroyed once it is transcribed to our electronic storage systems or
- c. We will store physical correspondence and documentation on site for the durations set out in paragraph 7.

6. Lawful Reasons to process Personal Data:

- a. We may retain and securely store personal information for the following lawful reasons as stipulated in the GDPR. This may be dependent upon the process under which the data is held:
 - i. **Consent:** Where You provide Us with personal information to conduct enquiries into our services so We may contact You to discuss Your needs. This is classified by us as *Consent Data*.
 - ii. **Contract:** Where We form a contract between Us and You to supply goods or services in order for that contract to be executed in full. This is classified by us as *Contractual Data*.
 - iii. **Legal Obligation:** Where We are required to keep records for the provision of goods and services to You for tax and accounting purposes or as a statutory requirement. This is classified by us as *Statutory Data*.

7. Retention of data:

- a. We will securely retain data for varying lengths of time depending on the type and purposes of the data.
- b. As a principle, We do not aim to retain data any longer than is necessary but as we are a relatively small company, we do not operate scheduled data destruction. Data destruction for archived data occurs on an ad hoc basis.
- c. Consent Data:

- i. We will retain consent data (enquiry contact details etc.) for not longer than one year.
 - ii. If consent data transpires to become contractual data we will retain the data as per the Contractual Data policy (paragraph 7.d.).
 - iii. We will destroy any consent data as soon as it becomes redundant to Us. In normal business activity, this will be within 28 days of acquisition and not longer than one year.
 - iv. We do not use this data for marketing purposes unless specific consent to do so has been provided.
- d. Contractual Data:
 - i. We will retain contractual data for a minimum of as long as Your company buys goods and services from Us plus 7 years.
- e. Statutory Data:
 - i. We will retain Statutory Data for a minimum of 7 years or indefinitely.

8. Sharing of Data:

- a. We will share Consent Data internally for the purposes of dealing with your enquiry. We will not share Consent Data with any other party unless expressly requested by you. We will not share Consent Data without specific consent from you.
- b. We will share Contractual Data as required to fulfil our contractual obligations only:
 - i. Specifically, We need to share address and contact information or special instructions with our GDPR compliant couriers if we are under contract to deliver your goods to a physical location.
 - ii. if appropriate in the conduct of normal business, with debt collection companies or for legal proceedings
- c. We will not share any Statutory Data with any organisation or individual unless required by law in the normal conduct of business or to assist in the recovery of debts or upon the Order of a competent Court.

9. Your Rights:

- a. Your rights with respect to your personal data are prescribed under GDPR and depend upon the type of data we hold.

- b. In all cases you have the following rights (unless expressly prohibited by the type of data held e.g. statutory requirement):
 - i. The right to be informed
 - ii. The right to access
 - iii. The right to rectification
 - iv. The right to erasure
- c. And with respect to the three specific types of data we hold, in addition you have the following rights:
 - i. Consent Data:
 - 1. You have the right to data portability
 - 2. You have the right to withdraw consent
 - ii. Contractual Data:
 - 1. You have the right to ask us to erase the data
 - a. After contractual obligations are fulfilled and
 - b. After Our statutory obligations are fulfilled
 - 2. You have the right to data portability
 - iii. Statutory Data:
 - 1. You have the right to ask us to erase the data
 - a. After Our statutory obligations are fulfilled
 - 2. You have the right to data portability

10. Contact:

- a. You can contact us to exercise your rights by any means:
 - i. In Writing to:
Data Controller
Positive ID Labels
Castle Lane
Melbourne
Derby
DE73 8JB
 - ii. By Telephone: 01332 864895

- iii. By Fax: 01332 864315
- iv. Via Website: Any contact form on any page or on the Contact Page