

GDPR PRIVACY POLICY FOR MARKETING AND CRM

Data controller (“the Company”): Coastline Contract Services Ltd, Unit C5 Plympton Park, Bell Close, Plymouth, PL7 4PB. Tel: 01752 231129.

Data Processor: Coastline Contract Services Ltd, Unit C5 Plympton Park, Bell Close, Plymouth, PL7 4PB. Tel: 01752 231129.

Introduction

The Company collects and processes information and data, relating to potential business leads. This information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your information, to protecting the privacy and security of your information and to meeting its data protection obligations under the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your information both during and after your business relationship with the Company. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all potential leads the Company may have in its database. It is non-contractual and does not form part of any contract, consultancy agreement or any other contract for services.

The Company is not required and has not appointed a data protection officer to oversee compliance with this privacy notice.

Data protection principles

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What types of information do we collect about you?

The Company collects, uses and processes a range of information about you.

This includes (as applicable):

- your contact details, including your name, address, telephone number and e-mail address
- names of your representative such as account manager, accounts department, their email addresses and telephone numbers.

How do we collect your information?

The information is collected by the Company by searching for suitable leads based on geographical areas and size of business or by receiving a request for quotation.

When compiling information, the Company will first check the status of the potential lead.

If the lead is a corporate body we will check the TPS and CTPS registers and our own database before making any calls to ensure the business is not in any excluded or opt out lists before calling.

Emails sent to potential leads will always provide an “unsubscribe” option so the person can ask us to be removed from our marketing list.

Why and how do we use your information?

We will only use your information when the law allows us to. These are known as the legal bases for processing. In the case of marketing activities, the Company will use the bases known as “legitimate interests” and “consent” to collect your data.

We will always use consent when contacting a sole trader or partnership.

The purposes for which we are processing, or will process, your information is to:

- to contact potential leads in order to offer our services
- to allow us to diarise further calls or emails if leads has not opted out so further contacts can be made at a more suitable time for lead.
- to allow us to maintain a list of companies or people who do not want to be contacted so we do not contact them again
- to carry out special marketing campaigns
- to reply to a lead contacting the Company.

Your information may be stored in different places, including in your paper file, in the Company IT system and in our IT accounts systems, it will also be stored in other IT systems such as the e-mail system.

Change of purpose

We will only use your information for the purposes for which we collected it. If we need to use your information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

Who has access to your information?

Your information may be shared internally within the Company, including with members of the sales department, senior management and IT staff if access to your information is necessary for the performance of their roles.

The Company may also share your personal information with third-party service providers (and their designated agents), including:

- external IT services that require access to data to maintain data base.
- professional advisers, such as lawyers (only applicable in case of legal claim)

The Company may also share your information with other third parties in the context of a potential sale or restructuring of some or all of its business. In those circumstances, your information will be subject to confidentiality undertakings.

We may also need to share your information with a regulator or to otherwise comply with the law.

We will not share your information with third parties unless to comply with the law. We will **not** share your data with any third party for marketing purposes.

How does the Company protect your information?

The Company has put in place measures to protect the security of your information. It has internal policies, procedures and controls in place to try and prevent your information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our Managing Director.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes. The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

For how long does the Company keep your information?

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

Information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

Your rights in connection with your information

You have the right to opt out at any time.

You have the right to change your mind and opt in and out or give and withdraw consent at any time.

Your data will be cleared to the minimum we require but information such as your company name, address and telephone numbers will be kept and will be clearly marked as "opt out" with a date of opting out, so we do not contact you again until you contact us if you change your mind.

It is important that we keep this information otherwise we would have no records of your decision to opt out.

Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your information for a purpose other than that for which the information was collected or where we intend to process new types of information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your information in other ways.

Contact

If you have any questions about this privacy notice or how we handle your personal information, please contact our Managing Director (details are at the top of this document).

End of policy