

**CUSTOMER / SUPPLIER PRIVACY STATEMENT**

**GDPR**

**ABOUT THIS DOCUMENT**

Details the data SMI holds on its customers and suppliers, why it is stored and how it is managed.

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**Document Control**

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# **Introduction**

This Privacy Policy has been written as an output from the review of the data held by SMI. It reflects an understanding of the personal data we hold, what we do with that data, how it is stored and who it is shared with.

# **Data held by SMI**

* Names and contact details of representatives in our customer network;
* Names and contact details of representatives in our supplier network;

# **The personal details we hold**

## **Customers**

We hold contact details for individuals we need to communicate with, this will include:

* Name;
* Email;
* Telephone;
* Correspondence address;
* Delivery address.

## **Suppliers**

We hold contact details for individuals we need to communicate with, this will include:

* Name;
* Email;
* Telephone;
* Correspondence;

# **Why we collect data**

All the personal data we collect is pursuant to managing our business of providing personal protective equipment.

To manage our business, we need to:

* Procure materials – we hold a list of approved supply companies and the contact details of their company representatives.
* Sell products – we hold a list of customers and details of our contacts within the business.

## **Lawful purposes for holding data**

### **Customer records**

The personal details held about customer representatives is held for the purposes of execution of contracts, legal requirements placed on us and, in some instances, legitimate interest of SMI.

### **Supplier records**

The personal details held about supplier representatives is held for the purposes of execution of contracts, legal requirements placed on us and, in some instances, legitimate interest of SMI.

# **Where we hold data**

SMI stores this data in their ERP system. The data is hosted by Oracle® and may be stored in their datacentres in the USA. Oracle® are covered by the EU/US Privacy Shield arrangement ensuring privacy is maintained on the data in their care. More details can be found at: <https://www.oracle.com/legal/privacy/services-privacy-policy.html>

# **Securing data**

Access to all information within SMI is on a need to know basis. Our ERP is protected by password governed access which denotes the level of access to data each user has.

Data held in cloud is secured by Oracle®, they state they follow the principles of ISO27001:2013 for all processing within their data centres.

# **Sharing data**

SMI only share customer and supplier personal data:

* If there is a statutory obligation on the company.
* For the purposes of arranging delivery with our approved couriers.
* If data is requested by a law enforcement or another statutory organisation if the request is accompanied by the appropriate authorisations or warrants.
* When we need to place special orders on behalf of a customer.

# **Contacting you**

SMI will contact you to:

* Ask you to complete customer satisfaction surveys. The data from these is used to review and improve the services we provide to our customers.
* Inform you of products which may be relevant to your business.

You can opt out of either of these communications at any time.

# **Data retention**

For companies who purchase products from us, we are required to retain details of the purchase for six years plus the current year.

For companies who have not purchased products from us, we review our marketing database every six months to decide how appropriate it is to retain details.

# **Issues or comments on this policy**

If you have any issues or concerns with this Privacy Statement, or the way SMI handles data, please contact: joanne.della-rocca@smigroupuk.com