

GDPR: DATA PRIVACY NOTICE FOR CUSTOMERS & SUPPLIERS

Introduction

Incatext Limited is committed to protecting and respecting your privacy.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person.

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). Incatext Limited does not hold this information.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Incatext Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: sales@incatext.co.uk or use our 'Get in Touch' link on our website www.incatext.co.uk.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

We currently have a trading relationship with you and your company. Therefore, we hold information for the administration of the orders and contracts we have with you to supply or receive goods and services.

We may keep you updated on our Products and from time to time and supply marketing information.

We make sure you have the necessary information so you can make informed decisions on planning and administering your own contracts and orders with us. Your company data may be used for Credit checks, Invoicing and VAT, together these activities fulfil our legal and contractual responsibilities as well as our companies legitimate business interests.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data e.g. names, addresses, telephone numbers, email, Company registration and VAT numbers. Credit checks for credit control processing.

5. What is our legal basis for processing your personal data?

Our lawful basis for processing your general personal data (article 6 of GDPR):

Lawful Basis	Processing Activity
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract.	Quotes, Orders and contract processing. Credit Checks.
Processing necessary for compliance with a legal obligation.	Invoicing and VAT control. In response to government agencies, National Statistics.
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject.	Product updates and recalls, Marketing.

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with selected courier and support services in the administration of your order, HMRC, Government agencies.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary, in most cases this is for the period of your association with us and for Government guidelines on statutory limits. Examples include: HMRC, VAT and in case of any legal claims/complaints etc.

8. Providing us with your personal data

We require your personal data as a requirement necessary to effectively manage our Customers and Suppliers. Without your data we would be unable to administer any order or contract with you.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you by submitting a Subject Access Request;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e.

where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer data outside the EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will notified to you in writing.

14. Further Information and how to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Sales Team via email; sales@incatext.co.uk or use our 'Get in Touch' link on our website www.incatext.co.uk.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Full details of GDPR and your rights are available on the (ICO) website <https://ico.org.uk/>