

## PRIVACY POLICY BUSINESS TO BUSINESS



### Privacy Policy Business to Business

#### Personal Data Stored

Whilst writing the new Data Protection Policy, to make it compliant with the new General Data Protection Regulation (GDPR), we have highlighted the need for you to be made aware of what information is collected about you, where it is stored and what we do with it.

Please read the information below. If you feel we are missing any information, please feel free to let us know. If there is any information you wish to be removed, please contact us. **If you have any issues with us processing personal information about you, please tell us ASAP**, so we can explain what information we will process, how it will be used and stored and discuss if there is any alternatives which will allow us to continue to work with you such as the use a pseudonym, or storing your data in another safe and secure way.

We keep this information to build up a picture of our suppliers, customers and prospective customers and help us pay them, support them and process our legal requirements as a business. In the majority of cases the reason to keep this information is to complete a contract or for legitimate interest. Any information which is in the public domain is free from consent. Information will only be in the public domain for these purposes if it is realistically accessible to the public. The question is not whether it is theoretically in the public domain, but whether it is actually available in practice. Although this is not an exhaustive list, examples of potential sources of information in public domain include: • websites • social networking sites • press releases • newspapers • magazines • books • government publications • Hansard • court judgments • TV or radio programmes • etc.

<b>What</b>	<b>Why and for how long</b>	<b>Where Stored</b>	<b>Who Sees</b>
Names	How have we your data?  You may have contacted us, or given us your business card.  We may also have sought you out through media (such as new reports, internet searches, LinkedIn etc.), or have your information because a colleague of associate has provided us with your details.  If you have contacted us to supply us, or given us your business card, we are holding your information under consent.  All other information, we are currently holding under the basis of a "legitimate interest". However, we would like consent.  We would like to keep this information for a minimum of 5 years from the last time of contact.	Verbally through the office, on computers (which are password protected), on the email system, (which is password protected), and if we have printed records due to a contract, these will be held in files behind the locked office doors.  Our doors remain locked all day, and only invited people are allowed into the offices, such as contractors, interviewees and for business meetings. There access to the office is monitored and limited.  Our computer back up, which is taken home at night is encrypted, and our archive is on a hard drive, encrypted and stored in a secure location, under lock and key	I am not going to limit Lenco by suggesting that only Len would know your name. The chances are that you will, as some point or another, have access to every employee.  However, your details will not be shared with other people or companies except to process a contract.

## **PRIVACY POLICY BUSINESS TO BUSINESS**

<b>What</b>	<b>Why and for how long</b>	<b>Where Stored</b>	<b>Who Sees</b>
Business relationship history	<p>This is held to build up a picture of who you are and what you can do, and is therefore held for legitimate interest reasons.</p> <p>The majority of this information is built up historically or through the public domain.</p> <p>We would like to keep this information for a minimum of 5 years from the last time of contact, or 7 years in the case of a contract having been formed.</p>	<p>Verbally through the office, on computer (which is password protected), on the email system, (which is password protected), and if we have printed records due to a contract, these will be held in files behind the locked office doors.</p> <p>Our doors remain locked all day, and only invited people are allowed into the offices, such as contractors, interviewees and for business meetings. There access to the office is monitored and limited</p> <p>Our computer back up, which is taken home at night is encrypted, and our archive is on a hard drive, encrypted and stored in a secure location, under lock and key</p>	<p>The chances are that you will, as some point or another, have access to every employee.</p> <p>However, your details will not be shared with other people or company except to process a contract.</p>
Business email address, address and phone numbers	<p>We may need this information for “Contract” reasons</p> <p>If you have contacted us to supply us, or given us your business card, we are holding your information under consent.</p> <p>All other information, we are currently holding under the basis of a “legitimate interest”. However, we would like consent.</p> <p>We would like to keep this information for a minimum of 5 years from the last time of contact</p>	<p>On computer with the personnel file (on a private computer which is password protected), in the personnel filing cabinets (under key). If you emailed us, it will also be on the company’s email account, which is password protected</p>	<p>I am not going to limit Lenco by suggesting that only Len would know your business email, address and phone number. The chances are that you will, as some point or another, have access to every employee. However, your details will not be shared with other people or companies except to process a contract.</p> <p>Please note that we sometimes send out marketing campaigns by MailChimp. Therefore your email address is being shared theoretically, but they cannot use any of your data. And we have confirmation that they will maintain GDPR standards.</p>

## **PRIVACY POLICY BUSINESS TO BUSINESS**

<b>What</b>	<b>Why and for how long</b>	<b>Where Stored</b>	<b>Who Sees</b>
<p>Marital status, family, date of birth, religion, and other personal characteristics or information such as holiday, or if you have been sick, or are having a baby etc.</p>	<p>There is all sorts of information that you may reveal about yourself, and vice versa, which is not relevant to us working together.</p> <p>Part of our Core Values is that we are human. Therefore, it is human for us to pursue more than a business working relationship with you.</p> <p>Information provided in the future, will be held under consent, with all previous information held on file deleted. Clearly we cannot delete human memory though. We would like to keep this information for a minimum of 5 years from the last time of contact</p>	<p>If the information is you emailed us, it will also be on the company's email account, which is password protected</p> <p>It is possible that, your contact, may write down a note of your birthday or other noteworthy date, such as when you are going to be away but other information, such as where you are going on holiday is stored in staff minds</p>	<p>Your point of contact, and any member of staff you are forming a working relationship with.</p>
<p>Information regarding a project, for example Brand guidelines, signage, blueprints and General Arrangement Plans,</p>	<p>We may have gleaned this information from the public domain – in which case see Business Relationship information</p> <p>We may be working for you, or you for us – in which case we have a a contract and will be kept for contractual reasons for a period of 7 years</p> <p>NB – NDA (Non-Disclosure Agreements are taken seriously by Lenco International, and all members of staff have contacts which include a confidentiality clause.)</p>	<p>Verbally through the office, on computer (which is password protected), on the email system, (which is password protected), and if we have printed records due to a contract, these will be held in files behind the locked office doors. Whilst these will be stored away at the end of a project, during a project these will be out on desks, and in the studio in their design team's area, so they are readily available.</p> <p>Our doors remain locked all day, and only invited people are allowed into the offices, such as contractors, interviewees and for business meetings. There access to the office is monitored and limited</p> <p>Our computer back up, which is taken home at night is encrypted, and our archive is on a hard drive, encrypted and stored in a secure location, under lock and key</p>	<p>I am not going to limit Lenco by suggesting that only Len would know your business email, address and phone number. The chances are that you will, as some point or another, have access to every employee.</p> <p>However, your details will not be shared with other people or companies except to process a contract.</p>

## **PRIVACY POLICY BUSINESS TO BUSINESS**

<b>What</b>	<b>Why and for how long</b>	<b>Where Stored</b>	<b>Who Sees</b>
Company Bank details	<p>When you pay us, we can see where the payments have come from.</p> <p>You may also send us your bank details to ask us to make a payment to you</p> <p>This may be kept for contractual reasons and for up to 7 years</p>	<p>This may be held by email, if you sent us the information by email (which is password protected)</p> <p>Hard copies may be printed – but these will be destroyed by shredding.</p> <p>Our Accounts are done on SAGE, and is stored, using passwords, on the cloud.</p> <p>Payments are made through Internet banking, (password protected) cheques and transfers. (arranged with the bank, and then filed in a locking cabinet)</p>	<p>Len Levick, your account handler, the accountant, and our Bank</p>
List of your Guests	<p>On maiden voyages, some clients provide us with the list of their guests so that we can design, and have manufactured, plaques to commemorate the guests trip. These are designed with each guests name to personalise them. This information will be stored with the rest of the project, and will therefore be kept for 7 years, to allow us to destroy the complete file in one go.</p>	<p>on computer (which is password protected), on the email system, (which is password protected), and if we have printed records due to a contract, these will be held in files behind the locked office doors.</p> <p>Our doors remain locked all day, and only invited people are allowed into the offices, such as contractors, interviewees and for business meetings. There access to the office is monitored and limited</p> <p>Our computer back up, which is taken home at night is encrypted, and our archive is on a hard drive, encrypted and stored in a secure location, under lock and key</p>	<p>Len Levick, your account handler, and the design team within Lenco.</p> <p>This is also shared with the manufacturer of the Plaques. A Confidentiality Agreement is in place between Lenco International and the manufacturer we have used (H. Marahrens)</p>

Clearly, you also have a responsibility for your data, in that you can disclose as much or as little as you like, (unless you have a duty to disclose certain information to us so that we can serve a contract).

We will not tolerate abuse, and so therefore we may share your information with the Police, Courts and legal representation if necessary.

We may share your information with our legal representation, for example when involved with a Non-Disclosure Agreement, and our Accountants, in respect of an audit, and we may, if necessary share your information with Government bodies, for example to comply with import and export law.

We use MailChimp to make email campaigns easier, (see email section above). If you are happy for us to hold your details, but just do not want to be sent any marketing style updates, please let us know, and we will adjust our records accordingly.