

## **Privacy Policy**

Background: Blue Electronics Design Solutions Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and will only collect and use personal data in ways that are described here, and in a way, that is consistent with our obligations and your rights under the law.

### **1. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 3, below.

### **2. My Rights**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to access the personal data we hold about you.
- b) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- c) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- d) The right to restrict (i.e. prevent) the processing of your personal data.
- e) The right to object to us using your personal data for a particular purpose or purposes.
- f) The right to data portability: This means that if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means. You can ask us for a copy of that personal data to re-use with another service or business in many cases.

- g) Rights relating to automated decision-making and profiling: We do not use your personal data in this way.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

### **3. Personal Data We Collect**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Address;
- IP Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Information about your preferences and interests

### **4. How We Use Personal Data**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for or may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing [privacy@BlueEDS.co.uk](mailto:privacy@BlueEDS.co.uk)).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic

Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## **5. How Long We Keep Personal Data**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods;

- For a maximum of one year after we have collected it if we have not entered into a contract with you for the provision of services.
- For a maximum of one year after the expiry of a contract with you for the provision of services, except for the following.
- In the case of financial information, six years after the expiry of a contract with you for the provision of services, in order to comply with HMRC regulations.

## **6. How and Where We Store / Transfer Personal Data**

We will only store or transfer your personal data in the UK or elsewhere in the EU. This means that it will be fully protected under the GDPR.

- We store all data in specific company applications unique to us
- All application access is via secure password
- In line with our Data Retention Policy, your data is deleted once
  - a) we no longer have a relevant use for it
  - b) it has passed the relevant expiry date

## **7. Sharing Personal Data**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **8. Accessing My Personal Data**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **9. Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website at <http://www.blueeds.co.uk/Privacy Policy>

## **10. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of The Data Protection Officer):

Email address: [privacy@BlueEDS.co.uk](mailto:privacy@BlueEDS.co.uk)  
Telephone number: 01792346289

Postal Address: Blue Electronics Design Solutions Ltd, Unit 37, The Workshops, Three Crosses, Swansea. SA4 3PG

*We may update this policy from time to time so you may want to check it each time you visit our website. We last changed this policy on 24<sup>th</sup> May 2018.*