



SALES & MARKETING DEPARTMENT

DATA PROTECTION COMMERCIAL POLICY & PRIVACY NOTICE	
Title	Data Protection/Privacy
Document	Policy
Version	4
Revised by	Donna Bryan
Authorised	Robin Boydon
Issue date	<b>06.07.2020</b>
Review date	<b>06.07.2022</b>

## Data Protection Commercial Policy' & Privacy Notice

### In Conjunction with the Data Protection Act 2018.

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### 1. General Statement

Tardis Environmental Ltd takes its responsibilities in relation to handling personal data very seriously. It understands the importance of protecting personal data, providing privacy measures and in working to ensure compliance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulations which became effective on 25 May 2018.

The Data Protection Act 2018 prescribes the way in which the Companies like Tardis Environmental Ltd may collect, retain and handle personal data and understands the changes for controlling and processing data.

We shall ensure that we communicate and work with staff, third-parties and clients to ensure that personal data is handled appropriately, by well-trained staff.

The definition of personal data is - information held either on a computer or in a paper-based filing system which relates to a living individual who can be identified from that data. The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified and applies to automated personal data and to manual filing systems where personal data are accessible according to specific criteria.

Tardis Environmental under the Data Protection Act 2018, is recognised as a Data Processor and a Data Controller.

We do not share any information with third parties. All personal information is processed internally for contractual or legitimate reasons under our lawful obligation.

### 2. Who are we and who you can contact?



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Tardis Environmental Ltd/Tardis Hire does not currently have a dedicated Data Protection Officer, as defined by legislation, due to the current size of our business. Our Directors and Senior Managers have overall responsibility for our data protection, supported by our HR Manager.

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access request or any other request regarding the information we hold, our contact details are: Tardis Environmental Ltd, Site 4, Halesfield 21, Telford, TF7 4PA. Tel 0800 731 0589 (Company No: 02581818) or via [hr@tardishire.co.uk](mailto:hr@tardishire.co.uk)

You may feel that you wish to contact the Information Commissioner's Office (ICO) at: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113

### **3. Processing or Collecting Data**

The personal data which we collect about you will only be processed where we have a lawful basis to do so. Note: if the email or contact is a generic email address or phone number, then no Data Protection issue exists.

- We will, in conjunction with entering into an initial pre-contract dialogue, under a Contract as its lawful basis, process your details that you provide to us in person, via email, via our website or verbally by telephone, in connection with a transaction and therefore potentially have a contractual lawful basis for holding certain information (in order to process the job/order). As our customer, we will ensure that you have the means to opt-out at any time, for whatever reason.
- As part of our lawful legal obligation, we will keep a record of any credit/financial dealings, as required by HMRC and current financial legislation.
- When undertaking marketing and sales mailouts, about products and services, all emails will have a clear statement in relation to how we process their information, how we use it and how long it is kept. Recipients will have a clear opportunity to unsubscribe (opt in/opt out) of different types of mailings from the Company. Personal information will only be processed internally for legitimate reasons and processed in a lawful manner.
- Data will only be used to verify information for bookings, services and confirmations, as well as updates, which is required as part of the contract entered into and to ensure accuracy.
- We may also ask for feedback in order for us to improve upon our own customer service provisions (in the legitimate reasons and processed in a lawful manner).
- Tardis Environmental has two websites:- [www.tardishire.co.uk](http://www.tardishire.co.uk) for our waste services and [www.Tardish2o.co.uk](http://www.Tardish2o.co.uk) for bulk water and associated services. Neither of these sites are e-commerce sites (we do not sell from the page). Visitors to the websites are given the opportunity to request further information or enquire about our services.

a. To allow us to comply with this request, we collect information which includes:

Name, address, telephone number, e-mail and brief details of the sort of service they are looking for from our Company. We use an auto bot on our website for you to enquire about our products and services. The service provider is fully compliant with GDPR and does not sell data on to third parties. Upon filling out a bot, your personal information is sent internally. If you require this data, please email [it@tardishire.co.uk](mailto:it@tardishire.co.uk) and within 7 working days this data will



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be sent back to you. If you wish for your data to be deleted contact [it@tardishire.co.uk](mailto:it@tardishire.co.uk) and within 7 working days we will confirm that this has been deleted. We do hold the IP addresses from transactions such as above, this information is kept securely on our server and is not used in anyway to process data.

All Marketing and Sales information which includes personal data will be subject to an annual refreshing process, where the recipients will be given the opportunity to opt out or choose their preferred method of contact and the type of correspondence they wish (if at all) to receive. The website will have an 'unsubscribe' option, should anyone wish to be removed at any time.

b. Who we pass your personal data to.

We will only supply your personal information to other parties where such as transfer is a necessary part of the activities that we undertake or whether you give us consent or where we are required to do so by law or regulation (e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime).

We never share your information outside our organisation for marketing purposes. You understand that we may disclose the information you provide to relevant other parties for the purposes described in this document.

c. Partners/Brought in List

We use Glenigans Limited for our marketing research purposes – please see their website via these links for their [Privacy Policy](#) or [GDPR](#) documents.

d. What we do not process:

Although, we gather IP addresses through enquiry requests we do not process these, we have a separate cookie policy which allows us to track data through Google's suite such as Google Analytics, to improve user experience. There is a guide on how to opt out of our cookies within the Tardis cookie policy (please see link: [Cookie Policy](#))

- We do not collect, use or store sensitive personal information (*Sensitive Personal Data, addressed in Article 9 of the GDPR and is described as information revealing any of the following: sexual orientation, health data, data concerning individual's religious or philosophical beliefs, biometric data used to uniquely identify natural persons, trade union membership, racial or ethnic origin, genetic data or political opinions*) in relation to our business/ domestic customers.
- We have a separate Data Protection Policy for our Staff, which forms part of the staff induction process.

**4. Keeping Records Safe**

Hardcopy documentation containing personal data is kept in secure locations with controlled access by senior managers only. This documentation is not kept for any longer than required and will be



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destroyed, once identified as no longer required. The Company has invested in good quality cross-cut shredders to ensure that this task is undertaken in compliance with GDPR regulations.

Electronic records – All internal data are stored on local servers with a backup at a data centre. Within the company we have three databases which have a hand in all internal data processing, MCS which is our main CRM for booking plant and our main contracts with clients. ACT which holds our marketing database. Then Sage which is used for all our financial and payments. We also store all phone recordings on 3cx's server meaning there is, phone number and the actual recording itself.

All computers are set so that they turn off/hibernate after 10 minutes inactivity, staff are required to Lock their device if they leave their desk.

We also operate a clear desk policy. We have a USB block to disable mass storage devices to stop any data being taken out the company.

Those staff who work with company laptops and mobiles, are required to take particular precautions in respect to ensuring security and confidentiality of the information. Whilst in transit company equipment should be kept in a secure location, if vehicle is then left unattended the member of staff should carry the items and keep them on their person at all times.

Staff laptops all use VPN's to connect to the server which uses encryption to transfer files securely.

a. Transfer of Confidential Information

All transfer of information carries an element of 'risk' that it may be intercepted by third parties (intentionally or otherwise) or go astray.

Documents are sent through the VPN to the file server as this is a secure encrypted way of transferring documents.

Any current hardcopy records, when not in use must be kept in lockable filing cabinets or cupboards.

When a domestic client pays for a service over the phone using a credit card or debit card, please note that unlike our general call system, the payment processing department telephone system is not recorded, this is to protect the information you give us over the phone, which includes your card number and 3-digit security code. When details are taken from you, they are typed straight on to the merchant transaction system which is set up on the computer. The client's card details are 'not stored by us. We do not recommend that you send card details to us via email, as this is not necessarily a secure method, if you do so this will be at your own risk.

We do, however, have a small number of clients who have authorised rolling payments to be taken from their card. The information we keep is classed as STRICTLY CONFIDENTIAL and is stored securely online via the merchant service provider. Only authorised Tardis personnel can access this information, in order to process it, via the secure online portal, which is password protected.

In some cases, we also hold bank details of our suppliers. As part of the same assessment process, we class this data as STRICTLY CONFIDENTIAL and therefore wherever possible, this data will be



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protected by passwords, restricted to authorised personnel access, and in some cases encrypted, depending on the software being used to process it.

**5. Your personal data protection rights**

We will only store your data for as long as necessary to comply with any legal or legitimate requirements (lawful processing)

Your Rights:

- To be informed about data processing activities
- Of Access Rights to the personal information we hold about you and therefore the right to request a copy of this information via a subject access request.
- The right of rectification, you may ask us to correct any inaccurate or incomplete data within one month.
- To erasure and to restrict processing. You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you might hinder or prevent our ability to provide products and services.
- Data portability
- To object
- In relation to automated decision making and profiling

**6. Transfer of Data Outside UK**

We don't do any business transfers outside the UK.

**7. Subject Access Requests (SARs)**

Customers and Employees have rights to see their personal information if they make a Subject Access Request to see the personal information you hold about them.

In conjunction with the GDPR Regulations Tardis Environmental Ltd will comply with a request without undue delay and at the latest within one month of receipt of the request or (if later) within one month of receipt of:

- Tardis Environmental Ltd making appropriate checks to ensure that the person who is enquiring has the right to request this information.
- Tardis Environmental Ltd requesting information to clarify the request.
- A fee (only in certain circumstances).

All policies and processes are regularly reviewed to ensure compliance across the business.

**Signed on behalf of Tardis Environmental UK LTD**

Name: Robin Boydon

Signed:

Position: Operations Director

Dated: