

GDPR Policy for Connect Mobile Radio Limited

Policy Doc as at 25th May 2018

Connect Mobile Radio aims to be as concise in detail and paper free as possible in the earliest possible time frame.

Signed M Mullins.

From 25/5/18:

A Privacy Policy stating the fact that any information held will not be passed to any third party is in action. We will email our clients to remind them that they can ask for their details to be removed if they so wish, because we do not have an opt- in facilitated system.

Also, note will be put on the footer of all emails with immediate effect, stating that anyone who does not wish us to contact them can reply asking for their information to be removed, this will be done immediately.

In the main, our clients are very large companies with a few exceptions, therefore, all client information is regarded as important – and very little as personal, mobiles are generally company mobiles as are email addresses. This information has been in most, if not all cases, provided by the contact in order to work with us.

We intend to contact all companies within the year to clarify information held is current and remove any that is not, by doing this we can also measure their interest in keeping in contact on-going, this will be noted on their record. Records are kept on google drive for each client.

We are unable and indeed consider it unwise to attempt to obtain new contracts from these clients we have a good working relationship and/or credit facility with, which may have been implemented many years earlier. New loyalties may now apply, and the business could suffer accordingly, especially on terms of business for payment.

After due consideration, it was deemed that all client information of any type should be kept for 15 years, unless asked to be removed by the client before this time. However, any request would be pending possible historic dispute issues. Also, this information forms part of the value of the business by the nature of the product they can last many years and we hope that previous clients will return to use our services again, it would be unwise to assume this may not be the case. Likewise, emails will be purged annually for those older than 12 months, with pertinent information being saved to the client file if need be.

Martin Mullins is the Data Controller for Connect Mobile Radio Limited.

There are people who handle calls at the office base it is considered although this may contain names or phone numbers there is very little risk as they are 95% of the time company mobiles.

No pc's are on site, so low risk in terms of linking this information to other data – however, this should be reviewed every 6 months to take account of business trends and staffing.

Suzanne Poole of Sphere Admin Solutions Limited is one of the Data Processors along with Martin Mullins and the engineers who visit sites on the company behalf. A process will be put in place to monitor and unify the way the engineers work. Mrs Poole logs in remotely, via passwords so again a low risk. See password process below.

There is considered no risk from Administrative partners eg: Accountant as they do not have access to client records.

It is considered that most if not all data held by Connect Mobile Radio would fall into the article 6 section 6 - for purpose of legitimate interest of both the Data Controller and a 3rd party. In this case where both parties need to work together for both supply and demand purposes of a product or service but are not directly linked by a literal contract as that is held at a much higher level.

If at anytime we are made aware of anyone leaving the employment of a client company we will remove the contact information held for that person, but not the records attached as they are part of the company information, not an individual.

A policy for regular password updates on computers will be put in place say on 1st of month, 3 monthly, a new password will be issued by the administrator – this will be except for online accounting systems held on behalf of clients for procurement purposes, no personal information is held on these and it would be too confusing and time consuming and very low risk to change these on a regular basis. Encryption of laptops may be considered.

A Privacy Policy is in operation.

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Review date: September 2018