



## **SANO UK Powered Stairclimbers Ltd GDPR Privacy Policy**

### **1. Introduction**

- 1.1 SANO UK Powered Stairclimbers Ltd (“SANO UK”) has created this document to demonstrate its commitment to data privacy and its alignment to the requirements of the Data Protection Act 1998 and, in substitution from 25 May 2018, the General Data Protection Regulation 2018 (“GDPR”) in respect of handling and processing personal data.
- 1.2 SANO UK is registered with the UK Information Commissioner’s Office as a Data Controller and Data Processor under registration number Z8379140.

### **2. Data received**

- 2.1 We (or our third party sub-contractors acting on our behalf of SANO UK) will collect and process data that is provided to us by clients/customers. Personal data may be included in the data you provide about delegates and the supply of goods contacts (“customers”). It is important that contractual arrangements with those individuals clearly set out how we will use their data and with whom it could potentially be shared. We require all our customers to comply with the GDPR and our Fair Processing Policy that is used for specific services supplied by SANO UK.
- 2.2 By adding individuals’ personal data to SANO UK’s systems, or by sending personal data via email or by other methods to SANO UK, you give consent to us processing the data and you confirm that you have obtained the appropriate consent from the relevant individuals for the personal data to be processed by SANO UK.
- 2.3 SANO UK will retain this data for the legitimate processing of the contract while you remain a SANO UK customer and thereafter where the Law/contract reasons require it.
- 2.4 We will use client/customer contact personal data for the purpose of services provided, once the contract has been successful this data will be held securely on our systems for the duration of the contract or for a longer period as determined by our agreement with a third party (see our Fair Processing Notice) or as legislation requires.
- 2.5 We will review client/customer data annually and delete those over 12 months old unless third party or legislation requires a longer period. For accounting services this is 6 years.

### **3. Individual Data**

- 3.1 You as a commercial company may provide us with personal data about contact information when you add delegates detail to training courses, or as a contact for warranty information. The personal data is usually limited to the details required for us to undertake the basic functions of the training and/or certification process.
- 3.2 These details will include a contact name, email and contact number.

- 3.3 This basic customer data will be held by SANO UK indefinitely to prove training has taken place or contacts for the safety compliance of the purchased equipment.
- 3.4 As an individual you may provide us with information about a third party contacts who will administer the activities associated with SANO UK on behalf of the company. These details may include:
- names, email addresses, telephone numbers, billing information.
  - information about other personnel and contacts for SANO UK provision of services or goods supply.

For example, accounts details, health and safety and other policies that may include personal data. It is important that you seek permission from the individual/customer contacts if you provide their personal data to us. We may use the contact's personal data for the functions described in the SANO UK Agreement.

#### **4. Instructors**

- 4.1 Instructors provide SANO UK with information about their experience and qualifications that confirm their ability to teach SANO UK training programmes. As such, SANO UK may hold a substantial set of personal details about an instructor or other staff. These may include:
- names, email addresses, telephone numbers and other contact information
  - proof of professional qualifications
  - employment history and training experience

This data remains on SANO UK's systems for as long as the individuals continue to be an instructor. If an instructor requires their personal data to be removed from SANO UK's systems because they are no longer fulfilling the role, they need to inform SANO UK so that relevant data can be removed from the systems.

#### **5. Data sharing**

SANO UK will never distribute or share personal data that is held on our system with any third parties other than SANO UK's employees and sub-contractors.

- 5.1 SANO UK has a number of suppliers of services where personal data is shared including but not limited to:
- Contact names and numbers for demonstrations of equipment
  - Contacts names for supplying the delivery of goods
  - Contacts and delegate name for the training of use of equipment
  - Contacts names for Warranty and Servicing controls.
- 5.2 We have carried out a comprehensive review of their activities in relation to the GDPR via the questionnaires and agreements that are in place, which will be reviewed annually.
- 5.4 Further information regarding specific companies can be provided on request.

## **6. Marketing**

- 6.1 SANO UK maintains basic marketing information within our financial software; this contains the details of individuals who have consented to SANO UK sending information about owned equipment (service requirements, product recalls and accounts requirements), as well as general news about the SANO UK to them via email.
- 6.2 Each email that is sent provides you with the ability to unsubscribe from receiving marketing emails at any time. Alternatively, you can opt out by sending a request specifying your new choice to [info@sano-uk.com](mailto:info@sano-uk.com)
- 6.3 We will at times contact you by email with important communications which we believe will be of legitimate interest to you regarding new or existing equipment, which you will be able to unsubscribe to, should you wish.

## **7. External Consultants, Sub-contract instructors, Suppliers**

- 7.1 SANO UK engages the services of sub-contractors and suppliers for various purposes within the company. It is necessary to obtain and retain personal data for the fulfilment of contracts. Data including but not limited to: names, addresses, contact details, , bank details – will be held on SANO UK Systems and Finance Software.
- 7.2 Contracts are reviewed annually, and inactive partnerships deleted from systems. It is necessary to share bank details with our bankers to make payments for services; SANO UK will always make sure that the details are only processed using secure banking systems. SANO UK will never share this information elsewhere, outside of the company unless required to do so by a regulatory or legal authority.

## **8. Employees**

- 8.1 SANO UK will only process and hold staff data for the legitimate purpose of employment. Personal data including name, address, contact details, NI number, date of birth, bank details, employment history, medical history, next of kin contact details is stored and processed on the SANO UK secure Management drive and payroll system and will be held for the duration of the employment.
- 8.2 On leaving the company all data will be removed from systems and personnel files and be archived for a period of 6 years before being securely destroyed. PAYE information will be held on payroll for 6 years after as required by HMRC.
- 8.3 CVs and interview notes will be held for 1 year after the recruitment of a role before being securely destroyed or deleted. Data for successful candidates will be stored with employment data.
- 8.4 Prospective CVs will be considered on receipt and destroyed should no suitable vacancies be available. SANO UK does not store prospective CVs.
- 8.5 Personal data will be shared with relevant agencies for the appropriate performance of their work role, pension schemes, tax affairs, benefit schemes, insurances and illness cover. Staff participation in such services will indicate consent to share required data for the performance of the service.

## **9. Security**

- 9.1 SANO UK has security measures in place to help protect against the loss or misuse of data under our control, whether this be physical or electronic
- 9.2 All personal data can only be accessed by unique log on to the accounts system and access is limited to authorised employees of the company.
- 9.3 SANO UK is PCI DSS (Payment Card Information Data Security Standard) compliant. Credit card information is never stored on SANO UK's systems and is only used to authorise the specific transaction through Lloyds Bank and then removed. Under no circumstances will your credit card information be passed to any other third party.

## **10. Where we store data**

- 10.1 All data in SANO UK is stored within SANO UK's own systems and property and is not outsourced to any external hosting provider
- 10.2 Data is backed up regularly on to encrypted portable media as a method of disaster recovery.

## **11. Website tracking and monitoring**

- 11.1 Our website uses cookie information to distinguish you from other users of our website. A cookie is typically a piece of information or code that transfers to and from the website. SANO UK use cookies to record information about your visit including pages visited and documents downloaded, no personal information is obtained.
- 11.2 Most web browsers will accept cookies and you have the option to prevent that, but in doing so you may not be able to take full advantage of the website. If you choose to do this, you may not be able to use certain features on our site, in which case please do call us on 01473 333889 or e-mail us at [info@sano-uk.com](mailto:info@sano-uk.com) and we will deal with your enquiry personally.

## **12. Destruction of physical data**

- 12.1 SANO UK employees are trained to destroy all personal data securely. All paperwork containing personal data is securely shredded.

## **13. Data breach incidents**

- 13.1 In line with our regulatory requirements, SANO UK has a set of processes for issue and incident management, including data breaches. These processes include the required notifications to be sent to the Information Commissioners Office and to customers. This is reviewed annually and may be subject to change.

## **14. The General Data Protection Regulation 2018**

- 14.1 SANO UK has adapted its policies and procedures to ensure it is compliant with the GDPR. This document has been produced and displayed in prominent areas to represent our current status and will be reviewed annually and updated as processes are developed. Under the GDPR, individuals have certain rights when it comes to the control of personal data:

**15. The right to be informed.**

15.1 Each individual has the right to be given information about how their data is being processed and why. SANO UK has provided this policy to show how we handle your data.

**16. The right of access.**

16.1 SANO UK has a duty to comply with the requirements of Subject Access Requests (SAR)

**17. The right to rectification.**

17.1 The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete.

**18. The right to be forgotten.**

18.1 You have the right to ask SANO UK to remove your data.

**19. The right to restrict processing.**

19.1 You may restrict processing of your data for a legitimate reason, we would still retain the right to hold that information as describe in previous paragraphs.

**20. The right to data portability.**

20.1 You have right in certain circumstances be able to obtain the information we hold about you and use it for your own purposes. Conditions apply.

20.2 Should you wish to exercise any of your rights above, please email [data.controller@sano-uk.com](mailto:data.controller@sano-uk.com) stating the following information:

Contact details

Full details of information relating to your request

Reason for request and the right being exercised

You will be asked to verify your identity if you are the subject, alternatively you will be asked to provide consent from the subject if you are a representative. Should we require further information we will contact you. Your request will be dealt with within 1 month of receipt of your request.

**Contact Us**

Questions and comments regarding this Privacy Policy should be submitted to SANO UK by email or phone as follows:

Email: [data.controller@sano-uk.com](mailto:data.controller@sano-uk.com)

Phone: 01473 333889