

## **ACORN INSTRUMENTS**

### **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS**

#### **Introduction**

Acorn Instruments ("We") are committed to protecting and respecting your privacy.

This policy (together with our website privacy notice) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

#### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

#### **2. Who are we?**

Peter Ward OF ACORN INSTRUMENTS is the data controller. This means we decide how your personal data is processed and for what purposes. For all data matters contact Peter Ward [info@acorninstruments.co.uk](mailto:info@acorninstruments.co.uk)

#### **3. The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

- To register you as a new customer
- To process and deliver your order including:
  - Manage payments, fees and charges

- Collect and recover money owed to us
- To use data analytics to improve our website, products/services, customer relationships & experiences

#### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data Identity
  - Contact** – Name, address, email, phone number
  - Financial** – Credit Card information
  - Transaction** – Products/Services purchased from us
  - Technical** – IP/Geographic Data
  - Usage** – How you use our website

We have obtained your personal data from filling in forms on our site [www.acorninstruments.co.uk](http://www.acorninstruments.co.uk) , or by corresponding with us by phone, email or otherwise. This includes information you provide when you conduct a search for a product, make a purchase and if you report a problem with our site

#### 5. What is our legal basis for processing your personal data?

##### a) Personal data (article 6 of GDPR)

##### Our lawful basis for processing your general personal data:

<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Performance of a contract with you to provide you with products or services as requested by you.
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	By law we have to keep basic information about our customers including contact, identity, financial and transaction data for six years after they cease being customers for tax purposes.
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	To use data analytics to improve our website, products/services, customer relationships & experiences

#### 6. Sharing your personal data

We do not and will not sell any of your information to any third party, including your name, address, email address or credit card information. However, we do share your information with a number of select third parties to enable us to provide our products and services to you.

- External Third Parties Service;
  - Providers based United Kingdom/Abroad who provide Courier Services.
  - Independent Instrument Technicians who carry out maintenance/repairs.

- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. How long do we keep your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers including contact, identity, financial and transaction data for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **8. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a

contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **9. Transfer of Data Abroad**

We do not transfer personal data outside the EEA.

## **10. Automated Decision Making**

We do not use any form of automated decision making in our business.

## **11. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **12. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **13. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact Peter Ward on [info@acorninstruments.co.uk](mailto:info@acorninstruments.co.uk)

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.