



## **General Data Protection Regulation - GDPR Compliance Policy**

Pollution & Process Monitoring (PPM) Ltd maintains data records to support its principle business activity of manufacturing, distributing and providing service support, on a range of water quality measurement devices. We are a responsible Company, who value our customers and the data they provide. The information we hold is not sold or rented, to a third party. Data held is reviewed and purged on a regular basis.

With the introduction of the General Data Protection Regulation from 25<sup>th</sup> May 2018, a European individual has the right to ask a Company what information is held on them and for this data to be rectified or removed, from their data base. The Regulation covers electronic and personal data held in a structured format i.e. systematically filed in hard copy or an electronic data base(s).

However, in order to fulfil our contract against a purchase order, PPM needs to hold certain data to support the sale of goods, for a legitimate period of time typically (at least) the life of the product. This data will be retained for at least the duration of the working life of the product enabling provision of spare parts, software upgrades, reagent supply, technical advice and service support.

The data retained may include the Company name, address, telephone, e-mail and the individuals representing the Company, in both technical and commercial capacity. We may also retain technical information provided by the customer during telephone discussions, face to face meetings and e-mail correspondence to support the sale of goods. Commercial information would include but not limited to, a copy of the quotation, tender documentation, sales invoice, accounts payable and delivery address information. We shall keep this information secure.

When completing the sale of goods, we may need to pass delivery and contact information to a third party such as a haulage company, courier or the Post Office, to allow delivery to an agreed address. These Companies have the same GDPR obligations, as detailed within their own policy statements.

Periodically, PPM has the need to inform its existing and potential customer base of product development or relevant case study information. For this purpose, PPM holds a separate data base of individuals who have provided consent to receive sales and marketing communication. Where we believe there is a legitimate interest, we will also communicate to individuals, companies and public bodies to advise them of the products and services we provide. Data used for this purpose will include data within the public domain. During the initial communication, we shall always provide the right to opt out of receiving future communication. Mailings will only be sent to individuals or companies where we believe they have a specific interest e.g. companies or individuals involved in water or waste-water treatment purchasing our type of product and not the general consumer.

A separate policy statement has been prepared covering employee personal data.

We have communicated the GDPR requirements to all employees within the Company so they understand their own responsibilities. Commercial data is accessed by individuals involved accounts and sales activities. Technical data is accessed by individuals involved in a technical capacity. Sales and marketing data is accessed by individuals working with a sales and marketing capacity. Employee personal data is only accessed by the relevant Directors within the PPM.