

Smith Signs Limited Privacy Statement

Updated November 2024
Checked and verified 27/11/2024

for CLIENTS / TRADE / SUPPLIERS

Smith Signs Limited is committed to protecting and respecting your privacy and will:

- Keep your personal data safe and private
- Not sell your data to third parties

Our privacy policy explains how any personal data we collect from you, or that you provide to us, will be processed by us. For the purposes of the Data Protection (Bailiwick of Guernsey) Law 2017, (“the **Law**”) the data controller Smith Signs Limited is a Guernsey registered company, registration number 26283, registered office of The Albany, South Esplanade, St. Peter Port, Guernsey, GY1 1AQ.

Our privacy policy applies to the following: Smith Signs Limited; the Smith Signs Limited websites and any online applications that run on smart phones, tablets, and other mobile devices.

If you are an existing customer or supplier we already have limited personal information about you or your company that you have provided, such as names, contact details, addresses, payment details, etc. Maintaining and processing this personal data is necessary for continued trade between Smith Signs Limited and yourself.

By trading with Smith Signs Limited or by submitting any personal data, you understand this collection, transfer, storing, maintenance and / or processing in so far as the data is necessary for the purpose for which it has been collected. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the law which in turn satisfies the GDPR of the EU.

This privacy policy may change / be updated as the need arises from changes in European legislation or local legislation.

With the exception of personal data specified in this policy we may collect additional personal information from you, only if you have provided it to us.

How collected information is used

We may use information held about you for various reasons, for example:

- To carry out / fulfill our obligations arising from any contracts entered into between you and us
- To comply with any legal and /or statutory obligation in terms of relevant local laws

Smith Signs Limited does not share the personal information of its customers or suppliers and/or their employees with any third parties for the purposes of further marketing by those third parties.

The information we collect from you will only be some or all of the following:

- Contact Name
- Company Name, registration number
- Postal and / or physical address
- Supplier payment details (which may include banking account information)
- Contact telephone number(s)
- Contact email address(es)

Some instances when such information may be collected, processed, maintained or stored are when you:

- Provide the information by emailing an enquiry to us directly or when using our website “Contact Us” forms.
- Contact us by telephone, post, fax or email: we may keep a record of that correspondence.
- Trade with us: the collection of personal data will be necessary to complete the trade contract.

Smith Signs Limited collects this data for contractual reasons.

The processing of personal data is necessary for the performance of a contract between you as the customer and Smith Signs as the provider. Without the required data we will be unable to fulfil the contract and this may result in you not receiving the service required.

Categories of personal data

The categories of personal information we collect and some examples of type of data are as follows:

<i>Category</i>	<i>Some examples of types of data</i>	<i>Some purposes for processing data</i>
Identity	Name(s), Representatives names	To manage trading relationship with you
Financial	Banking details, Payment history	To make and manage payments
Contact	Physical address, phone numbers, email address	To supply and deliver products
Transactional	Sales/Purchase order numbers and related payments	To manage customer/supplier accounts
Contractual	Credit references, Photographic details of contracts	To trade efficiently

Data will be collected, stored, recorded, consulted, used and archived as long as is necessary to fulfil contracts and any legal obligations.

Special categories of personal data

Special categories of data refer to personal data regarding ethnic or racial origin, criminal records, etc. Smith Signs Limited does not collect, store, maintain or process any of the special categories of data.

Automated decision making and profiling

Automated decision making, and profiling refers to a process of allowing computer systems to generate outcomes that have legal effect. Smith Signs Limited does not make use of automated decision making and profiling.

Where we store your personal data

- Any data that you provide to us which is held as of hard copy documents are filed securely on site.
- Any data that you provide to us which is held in digital format is stored, processed, and maintained on site and is transferred securely and backed-up to secure storage within our cloud IT environment, located within the EU.
- Guernsey has a current 'adequacy decision' according to the UK DPA and GDPR and offers an adequate level of data protection according to the UK Information Commissioner's Office and the European Commission, the Member States of the European Union are considered an authorised jurisdiction *as per the definition in s.111 of the Law*.
- Data is not transferred outside the EEA (European Economic Area)

Legacy Data

This is data, stored as digital or hard copy documents, pertaining to passed orders or contracts between you and us.

Smith Signs Limited will securely store any data for as long as is necessary:

- to facilitate any repeat orders and maintain existing and passed contracts
- to employ the expertise/methodology from passed contracts to facilitate new orders
- to exercise or defend our legal rights by way of complaint

At the end of each year personal data will be maintained by updating/deleting/retaining as necessary to ensure the data is correct.

After a retention period of ten years stored personal data will be deleted/destroyed unless:

- Contractual obligations between you and us are ongoing
- We have been instructed by you to erase your data prior to the ten year retention period

Disclosure of your information

In order to further our legitimate interests, it may be necessary to disclose your personal information to third parties:

- for the conclusion or performance of a contract made between the controller and a third party in the interest of the data subject - *s.2(a)(ii) of Schedule 2 of the Law*.
- If the processing is necessary for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by law, otherwise than by an enactment or an order or a judgment of a court or tribunal having the force of law in the Bailiwick - *s.6 of Schedule 2 of the Law*.
- in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers and suppliers, or others - *in accordance with Para 4 of Schedule 2 of the Law*

You will be informed if your personal information needs to be shared with a third party.

Data destruction policy

Data will be deleted/destroyed in accordance with the Law:

- Once no longer required, any hard copy documents or media will be disposed of in a shredding receptacle. The receptacle is stored securely on site.

- There may be occasion when outsourcing of data destruction is required. Smith Signs Limited will only employ a secure data destruction provider who is compliant with the law.
- Any digital files will be securely deleted from our on-site and cloud systems in accordance with our data destruction and document retention policies.

Your Rights

The Law gives you the right to access information held about you. Your right of access can be exercised in accordance with the Law:

- Right to information for personal data collected from data subject (*s.12 of the Law*)
- Right to data portability (*s.14 of the Law*)
- Right of access (*s.15 of the Law*)
- Exception to right of portability or access involving disclosure of another individual's personal data (*section 16 of the Law*)
- Right to object for processing for historical or scientific purposes (*s.17- 19 of the Law*)
- Right to rectification (*s.20 of the Law*)
- Right to erasure (*s.21 of the Law*)
- Right to restriction of processing (*s.22 of the Law*)
- Right to be notified of rectification, erasure and restrictions (*s.23 of the Law*)

For more information, please visit The Office of the Data Protection Authority's page on Individual Rights, available at www.odpa.qg or by following this link: [here](#)

Changes to our privacy policy

Our Privacy Policy will be updated as necessary in accordance with European legislation and local regulations. It will be checked and verified by The Office of the Data Protection Authority.

Queries and Complaints

Under s.67 of the Law you have the right to complain to the Office of the Data Protection Authority

If you have any requests concerning your personal information, please contact us by email: accounts@smithsigns.co.uk

You can also contact The Office of the Data Protection Authority:

Telephone: +44 (0)1481 742074

Email: info@odpa.gg

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