

GDPR – POLICY STATEMENT

Issue 1 – 26th January 2018

We at Challenge (Europe) Limited are committed to maintaining the trust and confidence of our customers, suppliers and employees by treating all data provided by them in a confidential and safe manner.

All data received is used by us exclusively for the purposes of enablement of trade between ourselves and our customer/supplier base, or in the case of our employees, as a means of meeting our statutory requirements as governed by employment laws, health and safety requirements and the like.

CEL do not sell, rent or exchange information with other companies. The one exception to this is where we are asked for trade references, and in these situations we will seek approval from the selected referees before proceeding.

WHAT DATA DO WE COLLECT?

Business (customer/supplier) data collected and stored is mainly that already in the public domain. This is typically: -

- Company Names*
- Company Addresses*
- Company Telephone & Fax Numbers*
- Company Email Address*
- Company Contact Names*
- Company Bank Details*

Other data that is in the public domain, such as company registration no's, VAT numbers, website addresses, etc may also be collected and stored within our business system.

Employee data stored is typically: -

- Name*
- Address*
- Telephone Numbers & Email Addresses*
- Next of Kin & Emergency Contact Details*
- Bank Details*
- Employment History*
- Qualifications*
- References*
- Training Records*
- Employment Contract*
- Medical Conditions*

Other data may be added, if required by employment and health and safety legislation.

WHERE DO WE STORE THE DATA?

Most data is stored on our mainframe server that is accessed by secure networked PC's. Some duplicate information is stored within the individual PC's and utilised by programmes such Microsoft Outlook for emailing and general communication purposes.

Paper documentation, such as sales/purchase orders, invoices, etc is securely stored short term in the main administrative office before being moved after, 12 months, to our long term storage facility but remain on site.

Employee data is not computerised and exists in paper format only.

HOW DO WE PROTECT THE DATA?

All IT equipment and paper documentation is kept on the one site which is protected by a monitored and NACOSS approved dualcom alarm system. The site is also fitted with a range of CCTV cameras that continuously records and can be remote accessed.

The individual PC's are used by authorised and trained personnel with access being password protected. Every PC carries continuously updated anti-virus and anti-malware software which is monitored for efficiency by a professional external body.

The mainframe server is accessed via the individual PC's and this access is also password protected. There is no external direct access to the mainframe server, any routine maintenance or updates to the software has to be authorised in advance and a specific portal opened only for the duration of the work.

Where some of our customers choose to pay by credit/debit cards these transactions are carried out by a standalone card terminal operated via a dedicated landline. There is no permanent computerised or written storage of the card details.

Employee data is stored in locked cabinets accessible by company directors only.

HOW LONG IS THE DATA STORED FOR?

It is a requirement of our quality registration to keep quality related data for a minimum of 10 years after which it is destroyed (see below for further details).

Financial records are kept for the statutory period of 7 years and then destroyed.

Employee records are kept for one year following date of termination and payroll records for three years.

All other data is kept, excluding the above and any other statutory requirements, for as long as it is necessary in conducting business with our customer/supplier base. Monitoring of contact details is continuous with names and extension numbers being deleted if no longer relevant.

DO WE HAVE A FUNCTION/REASON FOR EVERY PIECE OF DATA COLLECTED?

As previously stated the data collected is exclusively for the use of CEL in enabling the trading of our product range between ourselves and our suppliers/customers.

In general, no personal login, passwords, security or financial data is held other than that already identified and associated with our employees.

The only time we would divulge information to outside parties without prior consent is if we were legally requested to do so e.g. in the case of a criminal investigation.

WHAT IS THE PROCESS IF DATA REMOVAL IS REQUESTED?

We are happy to provide copies of information held on receipt of a “subject access request” under the Data Protection Act 1998. We will not disclose your personal information without consent unless under legal direction.

Individual contact details can be removed upon request although general company information may have to remain for the minimum statutory requirement periods. All removal requests will be treated on their merits and if necessary advice sought from the ICO.

The destruction of paper documents is carried out by an approved external agency and certification of destruction obtained.

Computerised data is removed by authorised and trained personnel.

COOKIES

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browsers.

Our cookie audit shows:

- 1. Essential session log and download cookies – anonymous and essential registration log cookies used when visitors subscribe or register for additional services.*
- 2. Google Analytics tracking cookies – anonymously track visitor site usage. For details of how to opt out of Analytics please [click here](#).*
- 3. YouTube tracking cookies – anonymously track visitor site usage when videos are played through this site. To find out more please [click here](#).*

For more information please also see your browser options as this may enable you to disallow cookies.

If you are using Internet Explorer you can get more information on cookies and how to disable them from the [Microsoft website](#). If you are using Mozilla Firefox you can get more information on cookies and how to disable them [here](#). If you are using Google Chrome you can get more information on cookies and how to disable them [here](#).

COMPLAINTS

We undertake to log your complaint thoroughly, to investigate it and respond. We will take action and apologise as considered appropriate and proportionate.

DATA BREACH

In the unlikely event of a data breach, procedures are in place to notify impacted parties within the 72 hours stipulated by GDPR legislation.

GENERAL

Any questions or concerns relating to this policy statement can be addressed by contacting The Data Controller - Challenge (Europe) Limited by telephone 01234 346242 or email sales@challenge-europe.co.uk.

CONDITIONS OF USE

By using this website it is a condition of use that visitors accept the terms of this policy statement.