



**1 SCOPE AND PURPOSE**

Total Solutions Technology (TST) are aware of obligations under the GDPR and domestic data protection legislation, and is committed to processing all client and supplier data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that TST holds on its Clients and Suppliers. The privacy notice also sets out how TST use information, how long they keep it for and other relevant information about client and supplier data.

This notice applies to current and former clients and suppliers. The wording in this notice reflects the requirements of The Data Protection Act 2018, regarding General Data Protection Regulation (GDPR.)

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### 2 USEFUL CONTACTS

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#### Data Protection Officer for TST

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### 3 DATA CONTROLLER DETAIL

TST is a data controller, meaning that it determines the processes to be used when using client and supplier data. The Data Protection Officer at TST can be contacted for more information regarding TST's processes.

### 4 THE PURPOSES OF PROCESSING YOUR PERSONAL DATA

We use your personal data for the following purposes:

- To correspond with you.
- To offer our services.
- To enter into contract negotiations.
- For the performance of any contract with you.
- To send out invoices to clients and follow up on payment of these.
- To make payments to suppliers.
- To maintain our own accounts and records.
- To adhere to legal requirements.
- To inform individuals of news, events or activities.
- You may give us information about by corresponding with us by phone, email or otherwise.

#### 4.1 THE DATA CONCERNED

We may process some or all of the following of your personal data as needed. This may include:

- Contact information, which may include, for example, some or all of your name, business address, email address, phone number, social media links.
- Invoices sent by suppliers or generated by TST for clients.
- Photographs supplied by clients for the purposes of fulfilling a contract.
- Photographs supplied by suppliers for the purposes of marketing.
- Contractual information agreed between both parties.
- Bank details supplied by yourself.



## 5 HOW WE OBTAIN YOUR DATA

We have obtained your personal data in one or more of the following ways:

- Directly from you when doing business with you (including previous business.)
- Through completing a webform on our website.
- From publicly available sources such as those published on company websites.
- Collected from correspondence with others such as other individuals in your organisation and you are cc'd.
- Referrals from other clients or individuals.
- Business cards from networking.

## 6 WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

Our lawful basis for processing your general personal data is as follows:

Lawful Basis	Personal Data Covered
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract.	<ul style="list-style-type: none"> <li>• <b>Contact details.</b></li> <li>• <b>Contractual information with clients or suppliers.</b></li> <li>• <b>Bank details</b> for suppliers for remuneration as per terms of contract, or occasionally for clients if a refund is required.</li> <li>• <b>CVs</b> of existing suppliers for performance of contract with client.</li> </ul>
Processing necessary for compliance with a legal obligation.	<ul style="list-style-type: none"> <li>• Preparation and storage of <b>invoices</b> in accordance with HMRC requirements.</li> </ul>
Consent of the data subject.	<ul style="list-style-type: none"> <li>• <b>Photographs of clients or suppliers</b> for the purposes of marketing.</li> </ul>
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.	<ul style="list-style-type: none"> <li>• <b>Contact details</b> of existing or potential clients and/or suppliers. We have conducted a Legitimate Interest Assessment (LIA) to verify that this is the correct lawful basis for the processing of these data.</li> </ul>



### 7 SHARING YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential and will be shared only with online contact management tools.

### 8 HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for no longer than reasonably necessary and we retain your data only for the following purposes, and use the following criteria to determine how long to retain your personal data:

Personal Data	Retention	Purpose
Contact details of clients and Suppliers.	Unlimited	Fulfilling our contract with you. Offering you relevant opportunities to engage us to work with you.
Contractual information.	Unlimited	Creating quotes and establishing working practices for current contracts. Taking steps to enter into contracts with you.
Bank details of client.	Unlimited	On occasion where a refund is required.
Bank details of suppliers.	Unlimited	For remuneration of current and future contracts.
Client invoices.	6 years	For fulfilling our legal obligation to HMRC for accounting records.



### 9 PROVIDING US WITH YOUR PERSONAL DATA

You are under no statutory or contractual requirement or obligation to provide us with your personal data below:

- Potential clients: Contact details.
- Supplier: Contact details, photographs and bank details.
- Clients: Photographs are required only for some contracts, where the client wishes their photographs to appear in the publication

Failure to provide data will have the following consequences:

- Potential clients: We will not be able to offer relevant opportunities for you to use our services.
- Suppliers and bank details: We will not be able to offer you work or pay you for your services.

We require your personal data below as it is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

- Existing clients: Contact details, contractual information (including information necessary for invoicing.)
- Suppliers: Invoices in order to be paid.
- Contractual information.

### 10 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 that we hold about you.
- The right to request that we correct any personal data if they are found to be inaccurate or out of date.
- The right to request that 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 the data directly to another data controller (known as the right to data portability, where applicable, such as 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, such as 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.
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data.

### 11 TRANSFER OF DATA ABROAD

We will not transfer your data outside of the jurisdiction of the GDPR unless we feel it is completely necessary for business continuation and we gain your explicit consent.



### 12 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.

### 13 CHANGES TO OUR PRIVACY NOTICE

Any changes we may make to our privacy notice in the future will be communicated to you by an employee of TST. For legitimacy, this is likely to be communicated by your TST Account Manager. To authenticate the legitimacy, you can contact the TST Data Protection Officer.

If you wish to exercise any of the rights explained above, please contact the TST Data Protection Officer.

### 14 MAKING A COMPLAINT

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO.) If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.