

General Data Protection Policy

1. Awareness

Sumo FTC LLP is a Health, Safety & Environmental Consultancy partnership assisting small to medium size companies to meet their legal obligation with regards to HSE compliance. All partners within the company have been made aware of the requirements to hold clients information with the strictest confidence and not to share information, unless agreed by all parties concerned when sharing information.

2. Information we hold

Sumo FTC LLP clients can be assured that all the information that we hold will not be shared or allowed to be accessed by a third party. This information will be held for the use of correspondence/communication purposes between clients and Sumo FTC LLP. The client, by employing our services have consented for SUMO FTC LLP to use the contact information to enable communications/correspondence to take place.

Sumo FTC LLP will only hold basic information with regards to all of our clients, the type of information held is as follows:-

- Contact details, name, address, telephone number, email address etc
- Client/company documentation, Company Insurance, Policy's, procedures, safe systems of work, work instructions, assessments, method statements, KPI matrix templates (with no data held).
- Email correspondence with login pass word protection.

3. Communicating privacy information

This information will be held for the use of correspondence/communication purposes between clients and Sumo FTC LLP.

Sumo FTC LLP will only hold basic information with regards to all of our clients, the type of information held is as follows:-

- Contact details, name, address, telephone number, email address etc

4. Individuals' rights

Sumo FTC LLP will work with our clients to ensure that the following rights for individuals is available and maintained:-

- See the information we hold about you as a client.
- Request personal data to be amended if it is inaccurate or incomplete.
- Request the deletion or removal of personal data where there is no compelling reason for its continued use.
- Block or restrict the processing of your personal data.
- Object to the processing of your personal data.

5. Subject access requests

When an access request is raised Sumo FTC LLP will ensure that a response is communicated to the individual or client. This response will confirm what action is to be taken and why if necessary.

Please note:- the following bullet points for information purposes.

- In most cases you will not be able to charge for complying with a request.
- You will have a month to comply, rather than the current 40 days.
- You can refuse or charge for requests that are manifestly unfounded or excessive.
- If you refuse a request, you must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest, within one month.

- 6. Lawful basis for processing personal data**
Sumo FTC LLP does not use its client's information to gain an advantage in the business market place and it does not share information with third parties in relation to personal/company data.
- 7. Consent**
Sumo FTC LLP will always seek the consent of clients prior to communications between third parties, to ensure that confidentiality is maintained.
No client details will be shared with a third party.
HSE documentation has to be shared as part of the contractual arrangements between Client, Principle Contractor, Contractor, sub-contractors and employees, which is subjected to HSE Legislation ie Construction Design and Management Regulations. (CDM Regs)
- 8. Children**
Sumo FTC LLP does not hold and will not hold any information with regards to children.
- 9. Data breaches**
Sumo FTC LLP will contact all of its clients who have been affected by a data breach upon the knowledge of when the breach occurred. Clients will be informed of what data/information has been exposed and if possible identify the data exposure. The nature of the data breach will be shut down and closed until secure access can be re-instated.
- 10. Data Protection by Design and Data Protection Impact Assessments**
Sumo FTC LLP clients can be re-assured that all information held is password protected and that virus software is regularly up date to ensure the integrity of our computer systems.
One of the key principles of the DPA 1998 and the GDPR is that the data we store and process shall be adequate, relevant and limited to what is necessary for the purpose it was originally collected.
- 11. Data Protection Officers**
Sumo FTC LLP is a partnership business and therefore each partner has been identified as Data Protection Officers. As stated section 2 the only data we hold on clients is for communication purposes.
- 12. International**
Sumo FTC LLP can trade all over the world with regards to its Sumo Fluorescent Tube Crusher. The data held by us will be for the purpose of communication and delivery of our products, from manufacturer to customer.