		<b>Policy Document</b>			Document Ref: <b>FUK – GDPR 1.2</b>	
Prepared by: <b>AAR</b>	Issued: <b>18-04-2018</b>	Revision: <b>02</b>	Revision date: <b>24-05-2018</b>	Approved by: <b>WAE</b>		Page <b>1 of 5</b>
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This policy for GDPR (General Data Protection Regulations) is made to comply with the EU's regulatory framework that will come into effect on 25 May 2018.

The law regulates how the company can collect, process and store personal data.

All employees are required to comply with this Privacy Policy when they come into force.

**Privacy Policy: (Data Protection Officer)**

As the nature of the business does not involve regular and systematic monitoring of large numbers of persons or the processing of sensitive personal information in large numbers, or personal data relating to convictions and offenses, it is considered that Fuglesangs UK does not need a security representative. The General Manager is responsible for this decision. (Alan Evans, tel. 0333 320 8667)

**The GDPR Regulation gives all data operators the obligation to:**

1. Provide information security
  2. Immediately notify the responsible officer of any deviations
- Data providers shall immediately notify the treatment officer if they believe that the instructions they receive are contrary to the regulation or privacy in general.

*Violation of these duties can lead to sanctions from the Data Inspectorate and if breaches result in loss, the data processor and the handling officer may become jointly and severally liable.*

**What kind of personal data is collected?**

Fuglesangs UK has collected and stored Name, Address, Email, Phone Number, and Product Interests.

**What is the purpose of collecting personal data?**

The information is collected to be in contact with existing and potential customers, with the intention of informing about important changes in products, marketing, order processing and invoicing.


**Classification of personal data:**

Information considered confidential is payroll information as well as personal data, national security numbers and bank account numbers. Information associated with this is only stored on the closed database and in the payroll system.

**Access to data:**

Customer Information: Sales Staff, order processors and those who interact with customers have access to Sage50 and SageCRM.

Confidential Information: Our Accountant, Financial Manager and Managing Director have access to our payroll and payroll system. Data access is limited to these people.

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#### How does Fuglesangs UK save personal information today?

1. CRM system SageCRM
2. ERP system Sage50
3. Internal secure server

#### How do we collect and use Fuglesangs UK's personal information today and in the future?

Fuglesangs UK collects information about customers and potential customers in the following ways:

1. Personal contact: The customer gives a business card and exchanges letters / contact with contact information:

*We consider handing over business cards, letters and email with information as consent that we can save and use the information.*

2. Information on company websites:

*We consider other companies' websites to be public information and may use this information for example, to contact a potential customer.*

3. By the fact that people are on our web pages:

*This information is not registered by Fuglesangs UK.*

4. By people clicking links in our Newsletter:

*Information with name of who has clicked links is stored in SageCRM.*

5. Visiting registration


*Sign in information that is stored for easier registration next time.*

#### Consent:

1. CRM: The CRM system supports the legislation consent function and access, as well as changes.
2. ERP: We consider the information in the ERP system to be so sensitive that consent is not required.
3. All company personnel, when accepting employment, imply consent by supplying required personal data.

#### How should Fuglesangs treat and store personal information?

1. Personal data must be stored in a secure area (Sage CRM, Sage50 or Internal Secure Server) and not disclosed to others without the consent of the person concerned.
2. Personal data shall not be disclosed to countries outside the EU / EEA area or to international organizations without consent from the individual.
3. Data Processors shall provide information securely and use caution when storing personal data
4. Upon termination of data processing, all personal information must be deleted, including copies.

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5. Upon request for access, correction or deletion of personal information, everyone shall comply and fulfill the request.

### **Exception handling**


If confidential personal information is noticed, the deviation must be reported to the Data Inspectorate. The deviation must be sent within 72 hours.

Requirements for the content of the error report:

1. Description of the deviation
2. Estimates of how many persons and records of personal data are affected by the security breach
3. Contact information for the responsible person at the company
4. Description of likely consequences
5. Description of measures implemented or planned to be implemented to close the deviation or limit the consequences

In case of anomaly, the affected persons shall be notified if it is likely that the discrepancy will entail a high risk of privacy to those affected. If the data is encrypted or measures taken to remove the risk notification is no longer necessary.

**Privacy Statement:** Privacy Statement is about how Fuglesangs UK collects and uses information about visitors to our websites. Our Privacy declaration is posted on the website with a link to this document.

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## Privacy Policy

Fuglesangs UK is responsible for processing your personal information in accordance with the Personal Information Act.

### 1. Processing of personal data

#### 1.1 Visitor information

Visitor information is information that is automatically logged in by clicking on the link in our newsletter. Visitor information is processed in anonymous form and is permanently deleted after a short period of time from our systems.

#### 1.2 User Information

User information is information that you have provided to us if you have registered as a user on our website, such as name, e-mail address and phone number. The user information is processed so that we can contact you in connection with the follow-up of our services (for example, to send you order and delivery confirmations) and, if you have asked for it (e.g. mailing newsletter). We store your login information in encrypted form to secure it against unauthorized access.

#### 1.3 Cookies

Fuglesangs uses cookies for better use of the website. This is indicated by the acceptance button on the website.

### 2. Retention of personal data

We do not disclose your personal information to anyone other than those mentioned here: If we have outsourced work or parts of it to an external service provider, we will be able to provide this service provider with the ability to store and use your personal information, but only to the extent necessary to provide the service. We do not sell your personal information to others, and we do not disclose your personal information to others for marketing purposes without you expressly agreeing to it.


### 3. Change of privacy statement

This Privacy Statement will be updated on a regular basis. The updated terms will come into effect immediately upon publication. Your use of our web pages is therefore governed by the version published at the time of use.

### 4. Questions or Comments?

If you have questions or comments about our Privacy Statement, or if you wish to gain access to, or request correction or deletion of your personal information, please contact us.

### 5. Complaint

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You have the right to appeal to the Data Inspectorate if you believe that your privacy is treated in violation of current regulations.