



GDPR Compliance Policy

All of our staff and contractors are familiar with GDPR and their personal responsibilities.

We have a right to erasure process. If you wish to be erased, please contact us at office@cad.s.co.uk.

We have a privacy policy which informs people what we do with their personal data, this is saved to the website.

All personal data is held in cloud storage or on secure servers within CADS and complies with all relevant EU policies or EU/US Privacy Shield policy.

When processing data we undertake the following:

- The processing is lawful, fair and transparent
- Transparent about what the data is being used for
- Data is collected for a specific purpose
- The data is necessary for the purpose
- The data must be accurate and kept up to date
- Data is not kept for longer than necessary
- The data is kept safe and secure

We do not process sensitive information directly.

All storage is secure and our suppliers have GDPR procedures in place.

We have a notification process in place for any breach.

How we comply with GDPR for our marketing activities

We use legitimate interest as the most appropriate basis for lawful processing and holding of data as part of our marketing activity.

We have identified the relevant legitimate interests

We have a legitimate interest, namely our commercial interest as a software development company, to contact businesses to discuss how we can help them with their engineering and scaffolding projects.

We believe that this passes the three tests set out by the ICO of purpose, necessity and balance.

In other cases, we may use explicit consent - for example where individuals have opted-in to receive information from us as regular emails.

Our processes have clear purpose.

There is clear purpose to how we process data as it helps us target businesses that we think are a good fit, where we believe that we can help them improve their engineering and scaffolding projects.

We have checked that the processing is necessary and there are no less intrusive ways to achieve the same result.

The processing is necessary and we routinely consider new ways to minimise the impact such as using frequency capping on adverts or using filters to reduce the frequency of emails sent to low engagement contacts.

We are confident that the individual's interests do not override those legitimate interests.

We believe there is real benefit in the products and services we offer our target market. We don't believe that relevant proactive communication about our services or helpful content with individuals in these businesses, overrides their interests because of the following precautions that we have taken:

- We try to only focus on individuals with roles in the relevant function and in some cases business owners/leaders. We believe that individuals in these roles are the most appropriate to evaluate our services and they would expect a software and services company like ourselves to be contacting them.
- We monitor the frequency of our email and retargeting activity to make a judgement about appropriate frequency.
- We provide Opt-Out functionality on all our emails.
- We manage our individual data using DotMailer and other GDPR compliance systems.

Are you still unsure about compliance for B2B marketing under GDPR?

The following paragraph is an extract from the UK Information Commissioner's Office and can be found on this weblink: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/legitimate-interests/when-can-we-rely-on-legitimate-interests/>

Can we use legitimate interests for our business to business contacts?

Yes, it is likely that much of this type of processing will be lawful on the basis of legitimate interests, but there is no absolute rule here and you need to apply the three-part test.

You are still processing personal data when you are using and holding the names and details of your individual contacts at other businesses. You must have a lawful basis to process this personal data.

You can consider using legitimate interests as your lawful basis for such processing. However, you need to identify your specific interest underlying the processing and ensure that the processing is actually necessary for that purpose.

Assuming you can meet these first two parts of the three-part test, you also need to consider the balancing test. You may find it is straightforward as business contacts are more likely to reasonably expect the processing of their personal data in a business context, and the processing is less likely to have a significant impact on them personally.

Example

Individuals attend a business seminar and the organiser collects business cards from some of the delegates.

The organiser determines that they have a legitimate interest in networking and the growth of their business. They also decide that collecting delegate contact details from business cards is necessary for this purpose.

Having considered purpose and necessity the organiser then assesses that the balance favours their processing as it is reasonable for delegates handing over business cards to expect that their business contact details will be processed, and the impact on them will be low. The organiser also ensures that it will provide delegates with privacy information including details of their right to object. The organiser subsequently collates the contact details of the delegates and adds them to their business contacts database.

If you intend to process the personal data of your business contacts you need to remember that individuals' rights, including the right to be informed, still apply.