

This policy describes how Aspect Scientific has certain obligations under privacy laws to notify individuals how it will process any personal information it collects about them, this covers interactions with staff, customers, suppliers and other third parties. This forms part of the General Data Protection Regulations (GDPR) which comes into effect May 2018. As a supplier of products and services either directly to end users or as a third party supplier, Aspect Scientific do not share information of these end users or customers with other companies / organisations in the course of their normal business.

Related documents:

PO001 IT Systems and Security Policy
WI057 Quality Records Retention and Disposal
FM155 Data Held and Withdrawal of Consent

Data collected at Aspect Scientific Ltd.

Who do we hold data from?

Aspect Scientific collect and store data for specific activities from different groups of individuals:

- End users of laboratory equipment
- Laboratory Managers and Senior members of staff involved with the laboratory equipment
- Customers – business to business contracted customers for the supply of Aspect Scientific's services
- Suppliers – parts & services providers , instrumentation, products and services providers
- Potential customers – draft customer contracts, quotations for potential business or instrument placements and technical services

What data is being held?

Aspect Scientific have various systems that hold data for business purposes;

- Laboratory staff names, job titles, work email address', department, contact telephone numbers and signatures of acceptance of completed service work
- Contract details for business customers including main office address, contact telephone numbers and email addresses, invoicing details
- As a third party supplier we hold contact details of other businesses that we work closely with, to enable a good relationship. We hold technical, accounts, managerial and sales staff email addresses and contact telephone numbers.
- Database of other potential customers e.g. NHS laboratories, food laboratories, academic establishments; workplace details only – addresses, contact telephone numbers and email addresses
- Supplier contact names, email addresses and telephone details with regards to the parts, products and services they provide to Aspect Scientific.

Patient information

In the course of Aspect Scientific's technical communication and troubleshooting with laboratories, we will occasionally ask for result files to be emailed, faxed or photographed to aid our diagnosis of the issue. The Technical Department and Field staff will therefore sometimes see patient results. All results that we see are labelled only with a laboratory barcode number or in some cases, we see a surname. This in itself is not enough to identify a patient and so we class these as anonymised. Results are saved as an attachment in the

case notes on our RSS CRM system for quality purposes and emails and original copies of results are deleted. After the case is closed, any paper copies of results are shredded for security before recycling.

How is this information used?

Aspect Scientific may use any data collected for the below purposes;

- Laboratory staff / end users details are used primarily for the day to day interactions when dealing with instruments breakdowns, technical support troubleshooting, preventative maintenance site visits, field service reports from Engineers, follow up satisfaction calls, quotations for products and services, technical bulletins and field safety notices related to their specific instrumentation.
- Supplier's details will be used in the purchasing of specific parts or products for use by Aspect Scientific staff. Also for supplier quality purposes.
- Our contracted business customer's information will be used to contact them for specific advice related to the product and sending scheduled KPI reports about our performance, for invoicing and managerial communication.
- Occasional targeted marketing campaigns to specific customer sectors e.g. Industry contacts, Biochemistry contacts, research organisations. These would again only be via email to those who consent.
- Data as a whole will also be used internally for responding to sales tenders i.e. answering questions about the number of instruments supported by Aspect Scientific– no contact names would be given in this circumstance.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal data that the Company maintains will be kept in paper files, while other personal data will be included in computerized files and electronic databases.

What systems are used?

Aspect Scientific use various paper and electronic solutions for storing data - refer to PO001 for information of the security of these systems. None of our data processing operations rely on automated decision making, all data is handled manually.

Where we process your personal data

Your personal data may be stored and processed within the UK and other countries in the European Economic Area (EEA).

We may also store or process personal data outside the EEA. Some information is processed through our inventory control, purchasing and sales order processing system which is hosted in Canada. We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests.

Personal data sent outside the EEA follows the below guidelines:

1. The country to which it is transferred is one which the European Commission considers to provide an adequate level of data protection
2. The service providers and other third parties to whom data is transferred undertake contractually to process data in accordance with our instructions and to maintain appropriate security to protect the personal data or we are obliged to provide the personal data to a government or public authority.

Who will we share information with?

Employees of Aspect Scientific Ltd exclusively are adding and viewing data on company internal systems. We transfer site, contact and instrument data to our systems provided to us by other companies if they have employed Aspect Scientific as their service provider. We will never share information we hold with other companies, suppliers or customers unless specific consent has been sought first.

How long will the data be stored for?

Refer to WI057 Quality Records Retention and Disposal for the full table, see below for specific data related records;

Record	Description	Responsibility	Media/Storage Location	Minimum Retention (Years)
Customer contact details	Each contact will have: Name, department, job title, telephone No and email address	QA	Electronic: RSS - company CRM system, Inventory & order processing	If informed that contact left the site or retired, data will be deleted straight away.
Paper copies of customer results	Any hard copies of patient results sent for troubleshooting	QA	Paper copies – Technical Support Specialists area	When issue resolved and case closed – shredded immediately
Cases related to breakdown of instruments	Logs of breakdowns, Technical Support Specialist notes of conversations with customers, related emails, troubleshooting information, service history & signatures on service reports	QA	Electronic: RSS - company CRM system	Until the end of life of the instrument + 5
Instrument Service reports	PMI & Breakdown reports	QA	Paper copies (up to September 2017); Electronic: RSS - company CRM system	Until the end of life of the instrument + 5
Technical Bulletins/Field Action/Recall Records	Formal requests for distribution records and customer verification forms	QA	Electronic: Network	Product Life + 7

What is the legal basis for processing the data?

- The data that Aspect Scientific hold is necessary for the purposes of the organisations legitimate business processes.
- The purposes of complying with our duties and exercising our rights under a contract for the sale of goods and services to a customer.
- The pursuit of our legitimate interests (as set out below);

We are transparent about the information we hold e.g. end users sign service reports to say they are happy with the Engineers work and these are then emailed straight to them on the address that they provide; end users expect to be notified by Aspect Scientific of any manufacturer related field safety notices and technical bulletins that will directly affect their working practices and / or patient results; staff give copies of previous and current training details and certificates to hold in personnel files; customers details are used to provide information and services as requested.

Version 2.0 Issued on 23/05/2018
Replaces Version 1.0 Issued on 26/08/15

THIS IS A CONTROLLED DOCUMENT

This copy was valid when printed and will not be updated. Check the Aspect QMS to verify the current revision



Our legitimate interests

The normal legal basis for processing customer data, is that it is necessary for the legitimate interests of Aspect Scientific, including:-

- Selling and supplying goods and services to our customers;
- Protecting customers, employees and other individuals and maintaining their safety, health and welfare; in relation to our products and services;
- Promoting and marketing our products and services;
- Sending marketing communications which are relevant and tailored to individual customers (including relevant instrument training course information) where people have consented;
- Improving existing products and services and developing new products and services;
- Complying with our legal and regulatory obligations;
- Handling customer contacts, queries, complaints or disputes;
- Effectively handling any legal claims or regulatory enforcement actions taken against Aspect Scientific;
- Fulfilling our duties to our customers, colleagues and other stakeholders.
- Providing quotations, proposals and other information on our products and services;
- Processing sales orders from customers.

Privacy

Consent

Where Aspect Scientific will use contact information for marketing products and services to customers by email, we will gain your consent beforehand. We will also ask for consent before displaying any customer feedback comments on our website or marketing / promotional material.

Consent will be gathered by email or via the Field Service Reports used on site. Our company CRM has the facility to manage who has consented to be contacted by Aspect Scientific for various purposes including essential reports and field safety notices and marketing purposes

Your rights

You have the following rights with regards to your data;

- The right to ask for a copy of personal data that we hold about you (the right of access);
- The right (in certain circumstances) to request that we delete personal data held on you; where we no longer have any legal reason to retain it (the right of erasure or to be forgotten);
- The right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you (the right of rectification);
- The right to opt out of any marketing communications that we may send you and to object to us using / holding your personal data if we have no legitimate reasons to do so (the right to object);
- The right (in certain circumstances) to ask us to 'restrict processing of data'; which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing); and
- The right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability).

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

Telephone; 01829 824825

Email; info@aspectscientific.com

Website & contact us page; www.aspectscientific.com

Post; The Old Barn, Oulton Park, Little Budworth, Tarporley, Cheshire. CW6 9BL

Any person or business can raise a complaint at any time with Aspect Scientific if they do not agree with how we are handling their data; we can then ensure they do not receive marketing emails or erase their details in full.

Compliance

Aspect Scientific regularly monitors compliance with data protection policies and reviews the effectiveness of data handling and security controls via our ISO9001 Quality audit procedure. As part of this compliance, we also manage information risks to understand the impact of handling personal data. Data Protection Impact Assessments (DPIA) take place for any new projects involving the handling of customer or personal data e.g. addition of new software. All staff complete mandatory data protection awareness training and new staff inductions include GDPR and data awareness information.