

Data Protection & Privacy Policy

1. Introduction

The following policy describes Aspect Scientific's obligations, under privacy laws, to notify individuals of how personal information may be collected and used. Our obligations extend to interactions with staff, customers, suppliers and other third parties, forming part of the General Data Protection Regulations (GDPR) which came into effect in 2018.

In the course of normal business, as a supplier of products and services to end users and third parties, Aspect Scientific does not share customer information with other companies or organisations.

All personal data handled by Aspect Scientific is processed, stored, and protected in compliance with ISO 27001 standards. This policy outlines our commitment to safeguarding the confidentiality, integrity, and availability of personal data and defines the principles and procedures to be followed by all employees.

2. Scope

This policy applies to all employees, contractors, and third parties for which personal data are collected, processed, or stored by Aspect Scientific. It covers all personal data, regardless of its format.

3. Data Protection Principles

Aspect Scientific adheres to the following data protection principles under the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018.

- a. *Lawfulness, Fairness, and Transparency*: Personal data shall be processed lawfully, fairly, and in a transparent manner.
- b. *Purpose Limitation*: Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- c. *Data Minimisation*: Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- d. *Accuracy*: Personal data shall be accurate and, where necessary, kept up to date.
- e. *Storage Limitation*: Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary.
- f. *Integrity and Confidentiality*: Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

Data collected by Aspect Scientific

4. From whom do we collect data?

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

- Staff members
- 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, instrumentation, products and services providers
- Potential customers – draft customer contracts, quotations for potential business or instrument placements and technical services

5. What data are held?

Aspect Scientific use various systems to store data for business purposes:

- Staff members personal details pertinent to the administration of compensation, pension, benefits, expenses, performance review, training, DBS clearance and other HR functions related to employment
- Staff photographs displayed on the company website and footage obtained from CCTV and vehicle dashcams
- Staff training certifications, licences, and competency information
- Staff personal addresses for the dispatch of engineering tools and parts related to their role
- Staff signatures provided when signing engineering service reports for customers
- Laboratory staff names, job titles, work email addresses, 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 for other businesses with whom we collaborate, to facilitate a good relationship. We retain email addresses and contact telephone numbers.
- Database of previous or potential customers e.g. NHS laboratories, industry/manufacturing, 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 supply to Aspect Scientific.

6. Patient information

In the course of Aspect Scientific's interaction with healthcare laboratories, we may request data files to be emailed, faxed or photographed to aid diagnosis and troubleshooting of the instrument fault. Staff will therefore sometimes encounter patient information and test results.

Staff must ensure that if stored or transmitted, these data are anonymised by removing information that identifies an individual and links them to information regarding physical/mental health, diagnosis of a condition or care and treatment.

Data may be saved as an attachment in the case notes on Sage for quality purposes.

In the event that the results are not anonymised and constitute patient identifiable data (ie. containing a combination of patient name, sex, NHS number, hospital ID number, test results etc), the

data must not be scanned/photographed/emailed or in any way recorded as this would constitute a General Data Protection Regulation (GDPR) breach.

7. How is this information used?

Aspect Scientific may use any data collected for the following purposes:

- Aspect Scientific collects personal data from staff to the extent necessary to establish and manage the employment relationship and related functions. In addition to the functions described in this policy, Aspect Scientific may also maintain other policies from time to time, dealing with specific areas of employment such as e-mail and internet use, security, and the administration of payroll. Aspect Scientific may also collect personal data through IT and other communications systems used to assist with the performance and administration of HR and other related functions.
- The collection, processing and management of staff business travel arrangements and expenses, including the arrangement of bookings with third party providers of travel and accommodation services, processing claims and making payments to employees.
- Staff photographs are held for the purpose of displaying on the company website. Members of staff are asked for their consent to this. Other social event photos are held and are not shared with any other 3rd party.
- Laboratory staff/end user's 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.
- 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 Aspect Scientific maintains will be kept in paper files, while other personal data will be included in computerised files and electronic databases.

8. 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.

9. Where we process your personal data

Data used and retained by Aspect Scientific may be stored and processed at data centres based within the UK.

10. Who will we share information with?

Where Aspect Scientific is a designated service provider; we may transfer site, contact and instrument data to our own systems. We will never share information we hold with other companies, suppliers or customers unless specific consent has been sought first.

11. How long will data be stored for?

Personal data shall be retained only for as long as necessary to fulfill the purposes for which it was collected. Aspect Scientific will establish and document retention periods for different categories of personal data. Upon expiration of the retention period, personal data shall be securely disposed of to prevent unauthorised access or use.

12. What is the legal basis for processing the data?

The data that Aspect Scientific hold are necessary for:

- The purposes of the organisation’s 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 (section 11).

13. 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.
- 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 purchase orders with our suppliers.
- Processing sales orders from customers.

Privacy

14. Consent

We will ask for consent before displaying any customer feedback comments on our website or marketing/promotional material.

15. Your rights

Data subjects have the following rights:

15.1 Right to Access: Data subjects can request access to their personal data and obtain information about how it is processed.

15.2 Right to Rectification: Data subjects can request correction of inaccurate or incomplete personal data.

- 15.3 *Right to Erasure:* Data subjects can request the deletion of their personal data under certain conditions.
- 15.4 *Right to Restrict Processing:* Data subjects can request the restriction of processing of their personal data under certain conditions.
- 15.5 *Right to Data Portability:* Data subjects can request to receive their personal data in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller.
- 15.6 *Right to Object:* Data subjects can object to the processing of their personal data under certain conditions.
- 15.7 *Rights Related to Automated Decision-Making and Profiling:* Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

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

Telephone: 01829 824825

Email: info@aspectscientific.com

Website: www.aspectscientific.com

By 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.

16. Data Security Measures

Aspect Scientific implements the following measures to protect personal data:

- **Access Controls:** Restrict access to personal data to authorised personnel only.
- **Encryption:** Use encryption to protect personal data during transmission and storage.
- **Regular Audits:** Conduct regular security audits.
- **Data Breach Response:** Implement a data breach response plan to handle data breaches effectively and notify affected data subjects and regulatory authorities as required by law.

17. Compliance

Aspect Scientific regularly monitors compliance with national data protection policies and reviews the effectiveness of our data handling and security controls. To ensure compliance, we also manage information risks to understand the impact of handling personal data.

ISO 27001

Aspect Scientific operates an information security management system which complies with the requirements of ISO/IEC 27001:2022.

Data Protection Officer

Aspect Scientific is not mandated to have a nominated Data Protection Officer owing to the size of the company. The Quality department is responsible for managing enquiries and GDPR compliance.

NHS Data Security and Protection Toolkit

As part of our obligation to ensure the safety of patient data in the course of our day-to-day business on NHS premises, Aspect Scientific is registered with the NHS Data Security and Protection Toolkit, a self-assessment tool to measure performance against the National Data Guardian's 10 data security standards. Registration provides assurance that Aspect Scientific practices good data security and that personal information is handled correctly.

Our NHS Data Security and Protection Toolkit certification can be viewed online using a username and password, provided by Aspect Scientific upon request.

18. Training

All staff complete mandatory data protection and cybersecurity awareness training on a defined basis.