



**Aerofloor**<sup>LTD</sup>

SPECIALIST SUPPLIER OF AIRCRAFT INTERIOR SOFT FURNISHINGS

## **Data Privacy Notice for Clients & Suppliers**

## Introduction

Aerofloor Ltd are committed to protecting and respecting your privacy. This policy (together with any other documents referred to on it) sets out the basis on how we use any personal information we collect about you when you use this website or contact us directly and how it will be stored and processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

**ICO registration reference details: ZA239269**

### **1. Definitions**

**Data controller:** A controller determines the purposes and means of processing personal data.

**Data processor:** A processor is responsible for processing personal data on behalf of a controller.

**Data subject:** Natural person

**Categories of data:** Personal data and special categories of personal data

**Personal data:** The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data:** The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and bio-metric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing:** Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party:** Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

Aerofloor Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

Aerofloor Ltd, 2 Edward Park, Grange Way, Whitehall Industrial Estate, Colchester, Essex, CO2 8FZ  
Email: [enquiries@aerofloor.com](mailto:enquiries@aerofloor.com) Phone: 01206 798707

For all data matters please contact our Data Representatives:  
David Welsh or Amy Weston

### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- ) To maintain accounts and records
- ) To contact you regarding any outstanding or current orders or enquiries
- ) To contact you about any payment queries regarding the company
- ) To contact you regarding any special offers or products Aerofloor are launching
- ) To inform you of any changes to the company's operations
- ) Where applicable, your information will be passed onto your designated freight forwarder/courier for shipment purposes

### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- ) Personal data - Name, Company Email Address

### 5. What is our legal basis for processing your personal data?

#### a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	To maintain accounts and records, to make contact regarding any outstanding or current order enquires, to make contact about any payment queries regarding the company and where applicable we will be required to pass information onto customers freight forwarder/courier for shipment purposes or vice versa
Processing necessary for compliance with a legal obligation	To maintain traceability as required by industry law
Legitimate interests	This is to allow Aerofloor to directly update and inform you of new products launches, special offers, other relevant industry information and any changes to the company's operations.

#### b) Special categories of personal data (article 9 of GDPR)

Aerofloor Ltd does not collect any information under the Special Categories or Personal Data section

### 6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with your designated freight forwarder/courier for shipment purposes and where necessary local customs. Once the details have been passed over these will then be the responsibility of the recipient and you should request further details from them regarding their policies.

## **7. How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary (if you would like further information on our retention guidelines, please contact one of our GDPR representatives; David Welsh or Amy Weston) and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data [Legal requirements, order amendments, import/export requirements, legal traceability requirements.]

## **8. Providing us with your personal data**

We require your personal data as it is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

Any data collected not necessary for contract purposes is done so either with the data subjects' permission or legitimate interest to make them aware of any new or relevant company/industry information. The data subjects rights as outlined below are still intact.

## **9. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- ) The right to request a copy of the personal data which we hold about you
- ) The right to request that we correct any personal data if it is found to be inaccurate or out of date
- ) The right to request your personal data is erased where it is no longer necessary to retain such data
- ) The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data
- ) The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means)
- ) The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- ) The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **10. Transfer of Data Abroad**

Aerofloor will only transfer data outside of the UK in order to fulfil contractual terms of an order. Aerofloor have implemented a safeguarding assessment for all third-party entities used.

## **11. Automated Decision Making**

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

## **12. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **13. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page, our company website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **14. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representatives David Welsh or Amy Weston with the contact information detailed in section 2.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#):

Phone 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England