



PRIVACY NOTICE FOR CLIENTS & SUPPLIERS

Purpose

Sonictek Limited (referred to hereafter as the 'We' or the 'Company') are committed to protecting and respecting your privacy.

This Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be 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 Regulations (the "GDPR").

Key principles

To outline the Company's processes aligned to Data Protection and Privacy in relation to you.

Who does this policy apply to?

Any clients and suppliers of the Company.

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 biometric 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 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.

Who are we?

Sonictek Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Sonictek Limited, Unit 22-23 B.Village, Endeavour Park, Baker Road, Nelson Park West, Cramlington, NE23 1XA. For all data matters contact our Data Representative, Paul Heritage on paul.heritage@sonictek.co.uk

The purposes of processing your personal data

We use your personal data for the following purposes:

a) Clients:

- To contact you to meet the obligations of our service agreement with you, or to meet the obligations of a request for our services from you
- To provide a service of IT support against our service agreement with you, or to meet the obligations of a request for our services from you
- To communicate with you prior to setting up a service agreement or to discuss provision of services from us to you
- Following a request from you for a service provision from us
- To maintain an ongoing trading relationship

b) Suppliers:

- To contact you in relation to a service you provide to us
- To maintain an ongoing trading relationship

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, address, email, IP address (where relevant), telephone number, payment details (when taking payment)

We have obtained your personal data from you through one or all the following means:

- face to face contact
- telephone or other verbal contact
- email exchange
- social media platform exchange
- handing over of business cards
- creation of service agreement
- online orders
- requests for subscription information
- registration of device serial numbers and subscriptions via the www.mysonicwall.com portal
- from SonicWall Inc. for the purpose of renewals

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:

Lawful basis	VIA
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	BUSINESS TO BUSINESS SERVICE AGREEMENT VERBAL OR WRITTEN COMMUNICATION ON A BUSINESS TO BUSINESS BASIS

More information on lawful processing can be found on the [ICO website](#).

Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with those persons with whom you have given permission for us to share the data with.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data:

- For as long as the contractual or trading arrangement exists (ongoing trading relationship)
- To satisfy HMRC requirements for accounting purposes (legitimate reason and/or legal requirement)

Providing us with your personal data

We require your personal data as it is one or all the following;

- an ongoing contractual requirement
- for the provision of services
- to maintain a trading relationship, or
- it could in the future be a requirement necessary to enter into a contract

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 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.

Transfer of data abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA).

Automated decision making

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

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.

How to make a compliant

To exercise all relevant rights, queries, or complaints please in the first instance contact our Data Representative via email: paul.heritage@sonictek.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 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.

Changes to our privacy notice

Any changes we may make to our privacy notice in the future will be notified to you by e-mail.

Contact

Questions, comments, and requests regarding this privacy notice are welcomed and should be addressed to Sonictek Limited, Unit 22-23 B.Village, Endeavour Park, Baker Road, Nelson Park West, Cramlington, NE23 1XA or to our Data Representative, Paul Heritage on paul.heritage@sonictek.co.uk