



## **Data Protection Policy v1.0**

# Data Protection Policy

## 1. Why we have this Policy

1.1 Yelo Limited needs to collect and use certain types of information about people [personal data] with whom we deal, in order to operate and carry out our legitimate business purposes.

1.2 This policy is served by [Yelo Limited of Trooperslane Industrial Estate, 20 Meadowbank Road, Carrickfergus, Co Antrim, Northern Ireland]. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information, including your rights under current laws and regulations.

## 2. Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Yelo Limited].
- "you", "the user" refer to the person(s) using this website or the person(s) whose information we process.
- GDPR means General Data Protection Act.
- ICO means Information Commissioner's Office.

## 3. Overview of this Policy

2.1. Data protection law across the EU - including the UK – changed from 25th May 2018. This introduces new obligations that all organisations must comply with, and the potential impact of not meeting these obligations being significant fines of up to 4% of global revenue.

2.2. The Data Protection principles mean that, to be lawful, the collection and use of personal data must meet the following criteria:

Lawfulness, fairness and transparency	Wherever personal data is collected an individual is provided with information on why we are collecting the information, what we will do with it, how long we will retain that information, etc. This is reflected in a privacy notice available in the Yelo Limited website.
Purpose limitation	There is always a legitimate ground to collect data: a) Consent (the individual wishes to be contacted) b) Contract (to fulfill a contract) c) Legal obligation (to fulfill a legal requirement) d) Vital interest (to protect someone's life) e) Public interest (to perform tasks in the public interest) f) Legitimate interest to both Yelo Limited and that individual

Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary kept up to date
Storage limitation	Personal data shall be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which they are processed
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, or destruction or damage, using appropriate technical or organization measures
Accountability	Yelo Limited shall be responsible for, and able to demonstrate compliance with the GDPR

#### 4. The policy

4.1 Yelo Limited requires having access to your data to be able to meet its contract and legitimate interest obligations.

4.2 To ensure Yelo Limited meets its legal obligations under data protection, personal data usage and communications must adhere to the following;

- i. Corporate branding, demonstrating that the email is legitimately from Yelo Limited should be used in agreement with staff
- ii. Messages should be sent to individuals separately, and care must be taken to ensure that email addresses are not inadvertently shared without prior agreement
- iii. Data should not be held which is not required.
- iv. The data can only be used for the purpose that is consistent with an individual's expectations – typically what they were told by Yelo Limited when they initially provided their personal information
- vii. Access to the data should be strictly limited to Yelo Limited staff and volunteers who have a valid business need to access the data.

## 5. Processing of your personal data

5.1 We are registered with the ICO under the Data Protection Register, our registration number is: **ZA246195**

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## 6. What information do we store on you?

6.1 Yelo Limited currently stores the following information to contact you for business purposes only. From time to time we may send you company news or trade show information.

- Name
- Business Email Address
- Business Address
- Business Phone

6.2 Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- **Lawful basis:** Contract  
**The reason we use this basis:** To fulfill contract obligations  
**We process your information in the following ways:** Account set up and administration. From time to time we may send you relevant marketing information in regards to events and product information.
  - **Data retention period:** We shall continue to process your information until the contract between us ends or is terminated under any contract terms.  
**Sharing your information:** We do store your information on Zoho CRM which is an online Customer Relationship Management (CRM) software but we do not *share* your information with third parties.
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- **Lawful basis:** Legitimate interests  
**The reason we use this basis:** To fulfill product information requests/brochure requests /legitimate business inquiries received on [www.yelo.co.uk](http://www.yelo.co.uk)  
**We process your information in the following ways:** Account set up and administration. From time to time we may send you relevant marketing information in regards to events and product information.  
**Data retention period:** We shall continue to process your information until the contract between us ends or is terminated under any contract terms.
- **Sharing your information:** We do store your information on Zoho CRM which is an online Customer Relationship Management (CRM) software but we do not *share* your information with third parties.

6.3 If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

## 7. Your individual rights

7.1 Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

7.2 You also have the right to complain to the ICO [www.ico.org.uk](http://www.ico.org.uk) if you feel there is a problem with the way we are handling your data.

## 8. Internet tracking

8.1 We use a third party tracking software [Extreme Tracking] on our website to track how you use the website in order to provide you with a better user experience. Extreme Tracking has been fully in compliance with the GDPR since May 25, 2018. You can read their full privacy policy [here](#).

## 9. Information we collect

- In operating our website we may collect and process the following data about you: Details of your visits to our Website and the resources that you access including, traffic data, location data, weblog statistics.
- Information that you provide by filling in forms on our website, such as when you register to receive information such as a brochure or contact us via the contact page.
- Information provided to us when you communicate with us for any reason.

## 10. Data security and protection

10.1 We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

10.2 In the event of a data breach we will notify you of the breach and report the issue to the Information Commissioner's Office.

## 11. Email marketing messages & subscription

11.1 Under the GDPR we use the consent lawful basis for anyone subscribing to our marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third

party service provider of software / applications that allow marketers to send out email marketing campaigns to a list of users.

11.3 Any email marketing messages we send are in accordance with the GDPR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also [unsubscribe from all MailChimp lists](#), by following this link, otherwise contact the EMS provider.

12.4 Our EMS provider is; MailChimp. We hold the following information about you within our EMS system;

- Business Email address
- Name
- Job title

## Appendix

**Document owner:** Dylan Burke

**Document reviewer:** Dylan Burke, Richard Furey, Lynn Good

**Document adopted:** June 2018

**Next review date:** TBD

### Review/change history

Date of Review/Change	Summary of changes	Version no.
June 2018	First Data Protection Policy, published in line with new EU General Data Protection Regulations.	1.0