



# Privacy Information Notice (PIN) - Customers

Dunstan Thomas Group Limited

*Dunstan Thomas Holdings Limited is part of the Dunstan Thomas Group of companies.*



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# 1 Privacy notice to representatives of customers

In connection with the entry into force of the United Kingdom General Data Protection Regulation (UK-GDPR), we would like to inform you about the processing of your personal data. As the representative of one of our customers we have and will collect Personal Data about you. This notice explains how Dunstan Thomas Group Limited (“we” or “DTG”), respects your privacy and protects the Personal Data we process about you. All processing of Personal Data (as defined below) is made in accordance with the UK-GDPR and other applicable law. This privacy notice describes how we collect, process and share your Personal Data.

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## 1.1 What Personal Data will be processed?

DTG has and will collect and process information about you as the representative of one of our customers: your name, date of birth, email address, title (Mr., Mrs., Ms.), position within the customer company, telephone number, fax number, name of the customer company that you represent and history of invites to our events as well as a communication log. We will also collect information regarding receipt of newsletters and marketing material we may send you in your capacity as representative of a customer and track which links etc. you have clicked on. The information set out in this section is referred to as your “Personal Data”. The Personal Data is collected from you directly and by tracked links in newsletters and marketing material. We may also collect Personal Data about you from other DTG companies. What is the purpose of processing your Personal Data?

The processing of your Personal Data is necessary for the administration of the customer relationship and to some extent for customer care and direct marketing. We use tracked links in our newsletters and marketing material for the purposes of customising such marketing in accordance with your interests.

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## 1.2 What is the legal basis for processing your Personal Data?

The processing of your Personal Data (i) for the administration of our customer relationship, (ii) for customer care and (iii) for marketing purposes is based on our legitimate interest.

The interest to administrate our customer relationship is considered legitimate based on (i) delivery being crucial for the fulfilment of the contract with the customer company, customer care being crucial for strong customer relationships and marketing being crucial for the business of DTG, (ii) that you are acting in your professional capacity and (ii) that personal data is kept to a minimum.

If you are a sole trader, the processing of your Personal Data for delivery of the products and/or services ordered by you are based on fulfilment of the agreement between us and you as a sole trader.

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## 1.3 Who has access to your Personal Data?

We have implemented appropriate technical and organisational measures to protect your Personal Data against loss or unlawful access etc. The number of persons with access to your Personal Data is limited. Only individuals associated with DTG that need to process your Personal Data in accordance with the purposes above will have access to your Personal Data.

We share your Personal Data with Salesforce.com as the provider of our central CRM-system and central marketing systems. We may also share your Personal Data with other DTG entities for the purposes set out in this notice. We will share your Personal Data with suppliers and partners that carry out services on our behalf. Our suppliers are changed from time to time but include IT-supplier and sub-suppliers that carry out certain service and maintenance and with whom you may need to coordinate. We do not transfer your Personal Data to a recipient located outside the UK without informing you and ensuring adequate safeguards in accordance with the Data Protection Act 2018 (DPA).

Your Personal Data that is processed for the administration of our customer relationship and for customer care will be stored until our customer relationship ceases. By administration of our customer relationship we include continuous communication, support and services throughout the life cycle of the product ordered from us. Your Personal Data is erased earlier if you cease to represent the customer company. In such case we will store your Personal Data for up to two years following the date when you ceased to represent the customer company.

Your Personal Data that is processed for direct marketing will be processed for such purpose until you unsubscribe or object to such marketing by contacting us at [info@dthomas.co.uk](mailto:info@dthomas.co.uk). If you unsubscribe or object, we will store your name and contact details in order to ensure that we respect such opt-out or objection.

Please note that your Personal Data will be stored for a longer period than the mentioned above if it is required by applicable laws, such as for accounting purposes.

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## 1.4 What are your rights?

Dunstan Thomas Group Limited, reg. no. 8160246, Dunstan Thomas Holdings Limited, reg. no. 3957367, Dunstan Thomas Consulting Limited, reg. no. 8162530, Digital Keystone Limited, reg. no. 6245391 and Platform Action Limited, reg. no. 08836936 with address Building 3000, Lakeside North Harbour, Portsmouth PO6 3EN are the controllers of the processing of your Personal Data. This means that we are responsible for your Personal Data being processed correctly and in accordance with applicable laws.

You are entitled to know what Personal Data we are processing regarding you, and you can request a copy of such data. You are entitled to have incorrect Personal Data regarding you corrected, and in some cases you may request that we delete your Personal Data (if, for example, the Personal Data is no longer necessary for the purpose for which it was collected). You also have the right to object to certain processing of your Personal Data (such as direct marketing), and request that the processing of your Personal Data be limited. Please note that limitation or deletion of your Personal Data may result in us not being able to fulfil our commitments. You are also entitled to extract your Personal Data in a machine-readable format and to transfer the Personal Data to another controller.

If you have questions regarding how we process Personal Data concerning you, you are welcome to contact us at [info@dthomas.co.uk](mailto:info@dthomas.co.uk) or by mail to the address above.

If you have any objections or complaints with the way we process your Personal Data, you have the right to lodge a complaint with the local data protection supervisory authority.