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PRIVACY NOTICE FOR CUSTOMERS

1. INTRODUCTION

We may have to collect and use information about our customers. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with our contractual obligations to our customers. It also covers our response to any data breach and other rights under the GDPR.

2. DEFINITIONS

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location or online identifier. It can also include pseudonymised data.

“Data processing” is 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.

3. DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent.
- b) data be collected for specific, explicit, and legitimate purposes.
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing.
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay.
- e) data is not kept for longer than is necessary for its given purpose.
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures.
- g) we will comply with the relevant GDPR procedures for international transferring of personal data.

4. TYPES OF DATA HELD

We keep several categories of personal data on our customers in order to carry out effective and efficient processes. We keep this data electronically within our computer systems.

Specifically, we hold the following types of data:

- a) personal details such as name, marital status, address, phone numbers & email addresses.
- b) references from former creditors (If you apply for credit terms).
- c) bank account/card details.

5. RESPONSIBILITIES

In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.

We have also appointed employees with responsibility for reviewing and auditing our data protection systems.

6. LAWFUL BASES OF PROCESSING

We acknowledge that processing may only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the customer’s consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Customers will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

7. ACCESS TO DATA

As stated above, customers have a right to access the personal data that we hold on them. To exercise this right, customers should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the customers making the request. In these circumstances, a reasonable charge will be applied.

8. DATA DISCLOSURES

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures only include to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

9. THIRD PARTY PROCESSING

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

10. INTERNATIONAL DATA TRANSFERS

The Company does not transfer personal data to any recipients outside of the EEA.

11. REQUIREMENT TO NOTIFY BREACHES

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

12. CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

13. CHANGES TO THE PRIVACY NOTICE

If we decide to update our policy, we will post the changes on our website. Where we feel it appropriate we will notify you by email, however please review the website regularly for any changes.