

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Stream Limited, is committed to protecting and respecting your privacy.

This policy 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 view 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').

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 identified 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 and 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, adaption 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 of 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?

STREAM LIMITED is both a data controller and data processor. This means we decide how your personal data is processed and for what process. Our contact details are: 66-68 CHAPEL STREET, MARLOW, SL7 1DE. For all data matters contact NIKKI LEGG OUR DATA PROTECTION OFFICER on 01628 495599 OR email nikki@stream-ltd.com

3. The purpose of processing your personal data

We use your personal data for the following purposes:

Processing necessary for the performance of our contractual obligations.	To maintain our own accounts and records.
To manage employees.	To process reward fulfilment.
To allocate rewards.	Tax liability.

4. The categories of personal data concerned

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

Personal data: - Name(s), business address, email address, phone numbers, other information required to provide data for HMRC.

We have obtained your data from your employer.

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.	To fulfil the Rewards Programme.
Processing necessary for compliance with a legal obligation.	To keep rewards information for reporting to HMRC.

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only where necessary with third party suppliers who fulfil the reward requests. Legal demands by overriding law enforcing authorities will also be honoured if correct permits/authorisation is held.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of up to 2 years after the disengagement of services in order to fulfil the legal requirement to retain financial documents for reference if an enquiry is opened. The extra time is to allow for record retrieval and destruction after the legal requirement has been met

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into the rewards programme. Without it we would not be able to fulfil the programme.

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 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. 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.

11. Changes to our privacy policy

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

12. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our DATA PROTECTION OFFICER on 01628 495599 or email nikki@stream-ltd.com

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office 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.