GDPR Statement

Lambda Photometrics Ltd Lambda House Batford Mill Harpenden Hertfordshire AL5 5BZ United Kingdom
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Registered Office: Lambda House Batford Mill Harpenden Hertfordshire AL5 5BZ Registered in England No: 1332370 Producer Reg. No. WEE/KB0053TQ

1. INTRODUCTION AND SCOPE

1.1 Lambda Photometrics Limited, ("Lambda") is committed to conducting its business in accordance with all applicable Data Protection laws, regulations and in line with the highest standards of ethical conduct. This policy sets forth the expected behaviours of Lambda employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and removal of any Personal Data belonging to a Lambda contact.

1.2 Personal Data is any information which relates to an individual and is subject to certain legal safeguards which impose restrictions on how organisations may process Personal Data. An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. Lambda, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose Lambda to complaints, regulatory action, fines and/or reputational damage. Lambda expects all employees and Third Parties to abide by this Policy. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

1.3 The Policy applies to all of Lambda employee's places of work, including home offices, where Personal Data is processed, in the context of:

- Lambda's general business activities.
- For the provision of goods or services to individuals and companies.

1.4 This policy applies to all Processing of Personal Data in electronic form or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

1.5 This policy has been designed to establish standards for the processing and protection of Personal Data by Lambda, its employees and Third Parties. Where national law imposes a requirement which is stricter than imposed by this policy, the requirements in national law take precedence. The protection of Personal Data belonging to Lambda's employees is not within the scope of this policy.

1.6 This policy has been approved by Lambda's Managing Director and is effective immediately.

2. POLICY

2.1 The establishment and operation of a system that provides guidance about what could be Personal Data held by Lambda, what is considered the appropriate use of Personal Data and how to provide a prompt and appropriate responses to Data Subject requests.

The type of data could include, but is not limited to the following:

- Full name and title.
- Employing organisation name and address.
- Department within the employing organisation.
- Position within the employing organisation.
- Product and applications interests.
- Work telephone number.
- Work email address.
- Details of approaches to Lambda and quotations made.

2.2 Where the enquiry to Lambda has been made by a private individual we may retain the private email and telephone number.

2.3 In certain instances, Data Subjects may pay by individual or company credit or debit card. The minimum card and personal details will be retained to satisfy legal and regulatory financial reporting requirements.

The Company does not retain the following information:

- the contents of the card magnetic strip (track data).
- the CVV/CVC (3 or 4 pin) code.
- any PIN or encrypted PIN Block.

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3. POLICY DISSEMINATION AND ENFORCEMENT

3.1 Management will ensure that all Lambda employees responsible for the processing of Personal Data are aware of and comply with the contents of this policy. In addition, Lambda will make sure all Third Parties engaged to process Personal Data on their behalf (i.e. their Data Processors) are aware of and comply with the contents of this policy.

4. DATA COLLECTION

4.1 In the majority of circumstances, Lambda has received Subject Data directly, however, Lambda may also source business to business (B2B), including publically available academic institutions, Subject Data from legitimate and regulated external organisations.

5. DATA SUBJECT CONSENT

5.1 Lambda will obtain Personal Data only by lawful and fair means and, where appropriate with the knowledge and consent of the individual concerned. Where a need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their Personal Data, Lambda is committed to seeking such consent. Ensuring the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language and will provide a simple method for a Data Subject to withdraw their consent.

6. DATA USE

6.1 Lambda uses the Personal Data of its contacts for the following broad purposes:

- General running and business administration.
- Provision of goods and services to Lambda customers.
- Informing about new technologies.
- Advising about equipment servicing requirements.

6.2 The use of a Contact's information should always be considered from their perspective and whether the use will be within their expectations or if they are likely to object. For example, it would clearly be within a Contact's expectations that their details will be used by Lambda to respond to a Contact request for information about the products and services on offer. However, it will not be within their reasonable expectations that Lambda would then provide their details to Third Parties for marketing purposes.

6.3 More specifically, Lambda will not process Personal Data unless at least one of the following requirements are met:

- The Data Subject has given consent to the processing of their Personal Data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the Data Controller is subject.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.
- Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a Third Party (except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject).

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6.4 There are some circumstances in which Personal Data may be further processed for purposes that go beyond the original purpose for which the Personal Data was collected. When making a determination as to the compatibility of the new reason for processing, Lambda will address the following additional conditions to determine the fairness and transparency of any processing beyond the original purpose for which the Personal Data was collected:

- Any link between the purpose for which the Personal Data was collected and the reasons for intended further processing.
- The context in which the Personal Data has been collected, in particular regarding the relationship between Data Subject and the Data Controller.
- The processing relates to Personal Data which has already been made public by the Data Subject.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is specifically authorised or required by law.

7. DATA QUALITY

7.1 Lambda will adopt reasonable measures to ensure that the Personal Data it collects and processes is complete and accurate in the first instance, and is updated to reflect the current situation of the Data Subject, including Personal Data known to be incorrect, inaccurate, incomplete, ambiguous, misleading or outdated, even if the Data Subject does not request rectification.

- Keeping Personal Data only for the period necessary to satisfy the permitted uses or applicable statutory retention period.
- The removal of Personal Data if in violation of any of the Data Protection principles or if the Personal Data is no longer required.
- Restriction, rather than deletion of Personal Data.
- A law prohibits deletion.
- Deletion would impair legitimate interests of the Data Subject.

7.2 If the Data Subject puts forward an objection, digital marketing related processing of their Personal Data must cease immediately and their details should be kept on a suppression list with a record of their opt-out decision, rather than being completely deleted. It should be noted that where digital marketing is carried out in a ‘business to business’ context, the Data Subject will have invariably already consulted Lambda directly.

8. DATA RETENTION

8.1 To ensure fair processing, Personal Data will not be retained by Lambda for longer than necessary in relation to the purposes for which it was originally collected. The length of time for which Lambda needs to retain Personal Data is determined by their equipment servicing requirements and legitimate interest in future technologies.

9. CHILDRENS DATA

9.1 Lambda has no legitimate business reason to process or retain Personal Data related to children or minors. If there is a concern, Lambda employees will make reasonable enquiries to determine if the Subject Data is a minor and then seek consent from the person who holds parental responsibility over the child. In the instance where Lambda provides temporary work opportunities to a minor, written or emailed parental consent will be required, and the minimum required information will be maintained for legal or regulatory purposes. No details will be held on Lambda’s Customer Relationship Management, CRM, system.

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10. DATA PROTECTION PRINCIPLES

10.1 Lambda has adopted the following principles to govern its collection, use, retention, transfer, disclosure and deletion of Personal Data:

Principle 1: Lawfulness, Fairness and Transparency
Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means, Lambda will make every effort to inform the Data Subject what processing will occur (transparency), the processing must match the description given to the Data Subject (fairness).

Principle 2: Data Minimisation
Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This means Lambda must not store any Personal Data beyond what is strictly required.

Principle 3: Accuracy
Personal Data shall be accurate and, kept up to date. This means Lambda must have in place, processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.

Principle 4: Storage Limitation
Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed. This means Lambda must, wherever possible, store Personal Data in a way that limits or prevents identification of the Data Subject.

Principle 5: Integrity & 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, destruction or damage.

Principle 6: Accountability
The Data Controller shall be responsible for, and be able to demonstrate compliance. This means Lambda must demonstrate that the five Data Protection Principles (outlined above) are met for all Personal Data for which it is responsible.

11. DATA SUBJECT COMPLAINTS

11.1 Complaints from a Subject Data, about the processing of their Personal Data, should put the matter forward in writing to the Managing Director via contact@lambdaphoto.co.uk. An investigation of the complaint will be carried out, to the extent that is appropriate based on the merits of the specific case. The Managing Director will inform the Data Subject of the progress and the outcome of the complaint within a reasonable period. If the issue cannot be resolved through consultation between the Data Subject and Lambda, then the Data Subject may, at their option and cost, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction.

12. DATA PROTECTION BY DESIGN

12.1 To ensure that all Data Protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, Lambda may undertake a Data Protection Impact Assessment (DPIA). Subsequent findings of the DPIA will be submitted to the Managing Director for review and approval. Changes to Information Technology (IT) structures or processes may be required, to ensure the security of Personal Data.

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13. DATA PROTECTION TRAINING

13.1 Lambda employees will have their responsibilities under this policy outlined to them as part of their staff induction process. In addition, Lambda will provide Data Protection updates as required for their staff, to include:

- Employee's duty to use and permit the use of Personal Data only by authorised persons and for authorised purposes.
- The correct use of passwords, security tokens and other access and security mechanisms.
- The importance of limiting access to Personal Data, such as by using password protected screen savers and logging out when systems are not being attended by an authorised person.
- Securely storing manual files, print outs and electronic storage media.
- The need to obtain appropriate authorisation and utilise appropriate safeguards for all transfers of Personal Data outside of the internal network and physical office premises.
- Proper disposal of Personal Data by using secure shredding facilities.

14. TRANSFERS TO THIRD PARTIES

14.1 Lambda will not transfer Subject Data to Third Parties, but may allow access by Third Parties, (including Cloud Computing Services), when it is assured that the information will be processed legitimately and protected appropriately by the recipient. Where Third Party processing takes place, the Third Party is considered a Data Controller or a Data Processor of the Personal Data being transferred, an appropriate agreement will be put in place between the parties, to clarify each party's responsibilities in respect to the Personal Data transferred. The agreement must require the Data Processor to protect the Personal Data from further disclosure and to only Process Personal Data in compliance with Lambda's instructions. In addition, the agreement will require the Data Processor to implement appropriate technical and organisational measures to protect the Personal Data as well as procedures for providing notification of Personal Data Breaches.

15. INTERNATIONAL

15.1 Lambda may transfer Personal Data to internal or Third Party recipients located in another country where that country is recognised as having an adequate level of legal protection for the rights and freedoms of the relevant Data Subjects. Where transfers need to be made to countries lacking an adequate level of legal protection, they must be made in compliance with an approved transfer mechanism.

Lambda may transfer Personal Data where one of the transfer scenarios list below applies:

- The Data Subject has given consent to the proposed transfer.
- The transfer is necessary for the performance of a contract with the Data Subject.
- The transfer is necessary for the implementation of pre-contractual measures taken in response to the Data Subject's request.
- The transfer is necessary for the conclusion or performance of a contract concluded with a Third Party in the interest of the Data Subject.
- The transfer is legally required on important public interest grounds.
- The transfer is necessary for the establishment, exercise or defence of legal claims.
- The transfer is necessary in order to protect the vital interests of the Data Subject.

16. POLICY MAINTENANCE

16.1 All inquiries about this policy, including requests for exceptions or changes should be directed to the Managing Director via contact@lambdaphoto.co.uk. This policy shall be available to all Lambda employees through the internal drive or via alternative means as deemed appropriate and Lambda employees will be informed about any significant changes, with any revised version being made available on the company's internal drive.

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