

COMPANY BACKGROUND

Ashdale Business Consulting (the Company) Ltd is a small B2B independent consultancy solely owned by Chris Holden. Its main activities are to provide advice, support and training to companies within the hospitality sector. Typically this would include Brewers, Microbrewers, Cider Makers, Pub Companies through to Individual licensed outlets.

From time to time the Company will provide advice, support and training to other sectors but currently not on a regular basis.

PURPOSE OF THIS DOCUMENT

With the introduction of GDPR on the 25th May 2018 Ashdale Business Consulting has been reviewing its internal procedures concerning the following 2 key areas:

- Customer Data: Including its collection, processing, storage and usage
- Data Protection: Including security, protection and back-ups

This document sets out the Company's latest processes and practices in these two important areas. It will be kept up to date to reflect any changes made due to either internal or external factors. A copy is available on the Company's website – www.ashdale-consulting.com.

It looks to make every effort to adhere to the 6 key principles of GDPR. See below.

6 KEY PRINCIPLES OF GDPR

1. Fairness, Lawfulness and Transparency

Processed lawfully, fairly and in a transparent manner in relation to individuals.

2. Purpose Limitation

Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

3. Data Minimization

Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. Accuracy

Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

5. Storage Limitation

Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

6. Security

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, using appropriate technical or organisational measures.

CUSTOMER DATA

Why Is Customer Data Needed?

Customer data is needed for the following reasons;

- To provide Products and Services, to fulfil my commitments to you under our working arrangements/contracts
- To help improve my Products and Services by gathering feedback and better understanding requirements
- To respond to requests for information
- To provide information and marketing content
- To make prospective clients aware of my Products and Services*

**Many projects come from existing customers or recommendations however from time to time there is a need to promote what services are available to other businesses. For a small business such as this it is not financially viable to advertise in the trade press or similar costly communications. The main way to make potential customers aware of what my business has to offer is to write a letter or email.*

Ashdale Business Consulting Ltd will therefore collect data in order to help do this.

Where Does The Customer Data Come From?

Data comes from a number of different sources most notably information which is already in the public domain. Data has never been purchased from 3rd party agencies and there is no intention to do so.

- Company Websites
- Presentations (when in the audience)
- Business Cards (from meetings)
- LinkedIn (rare occasions, usually as a follow-up)
- Attended a Training Course

What Customer Data Is Collected?

As a B2B organisation Ashdale Business Consulting Ltd only ever collect information which it believes relates to a company or an employee of a company who would be interested in its services. In the majority of cases email addresses are clearly company assigned, for example chris@ashdale-consulting.com. Occasionally particularly with smaller companies such as micro-brewers an email address might be name@gmail.com. In these instances every effort is made to ensure that the address is being used for business purposes.

- Where the data has been collected/sourced
- Company Name
- Company Employee & Job Title (where appropriate)
- Company Postal Address & Telephone Number (not personal)
- Company Email Address

How Is the Customer Data Stored?

For each discrete group of customers i.e. golf clubs in the Midlands there is a separate excel spreadsheet to hold the data. Every spreadsheet is password protected.

For each potential customer there a full record of when and how they have been contacted.

For each discrete channel/geography there are 2 sets of records. One called 'live' and one called 'leave-hold'. Any customers who have indicated that they no longer wish to receive marketing material are immediately removed from the 'live' list and added to the 'leave-hold' list.

Unsubscribing From Receiving Marketing Material

As of Spring 2018 marketing emails that have been sent out have included an unsubscribe option. This enables contacts to quickly and easily request to be taken off mailing lists. Additionally letters or emails will also be received to ask to be taken off mailing lists. In all cases this is done immediately.

Updating Customer Data Records

Unless advised otherwise it is Company policy to review individual customer data on a 6 months basis. That way it ensures that the right people are being written to and the communications remain relevant.

The current plan is to revisit companies who have previously asked to be removed from receiving marketing material every 2 years to check that this is still the case.

Customer data collected from attendees of face-to-face training or who enrolled in Ashdale Academy will be deleted after a maximum of 2 years following the course/workshop.

Ashdale Academy is an on-line training portal which provides free and chargeable courses. Details can be found at www.Ashdale-Academy.com.

Sharing Customer Data

My records are never shared with any other company unless consent has been given.

Customer Data Storage and Back-up

See details in the IT Policy below.

RELATED IT POLICY

Computer Overview

Ashdale Business Consulting currently has two laptops. A Samsung notebook running Windows 7 which is only ever used in the office and an ASUS notebook which running Windows 10 which is used for customer presentations and projects. A password is needed to access either laptop.

Security and Virus Protection

Each laptop has Norton Security Deluxe loaded. This is an annual agreement which is updated every year although the exact version of Norton may vary slightly.

They also have Malwarebytes free version loaded. This program is run at the end of every calendar month as a minimum. This is on both current laptops.

When prompted all Windows updates are always run to ensure that both laptops have the latest versions loaded.

Customer Data & General Storage

The previously identified customer data excel spreadsheets are saved to the cloud. This can be seen as the L:/drive from either laptop. This is currently provided by Knowhow (Curry's) and is due for renewal on the 10th September 2018. The current plan is to renew this for a further 5 years.

It is unclear at this moment where the Knowhow cloud servers are physically located.

Customer Data & General Back-up

Once a week a copy of the L:/drive is made to the Samsung office based computer.

Once a month a copy of the L:/drive is also made to the Asus laptop.

Currently exploring options to purchase an external drive to save the L:/drive and other backs to.



Customer Data Best Endeavors

These Privacy & Data Protection Policies have been designed to safeguard customer and potential customer data as much as possible. Ashdale Business Consulting Ltd will only use customer data in a responsible way, to support existing customers or in order to make would-be customers aware of the services that it offers.

These Privacy & Data Protection Policies (Version 2.0) are valid from 1ST December 2018 until superseded.

