THRUPUT

# **THRUPUT**

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# **GDPR Compliance Privacy Policy**

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Author: ND Date: Oct-2018 THRUPUT Thruput Limited

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#### **GDPR** compliance 1

Thruput is an equipment manufacturer that operates on a Business-to-Business trading basis only.

Thruput do not engage with the general public or children in any way, nor does the company collect or record personnel data from among our vendors or customers. The company does not seek for, use or retain any data of a sensitive (or special category) nature from our own staff or the staff of our customers.

Due to the world-wide nature of our business, Thruput have implemented a GDPR assessment process as follows:

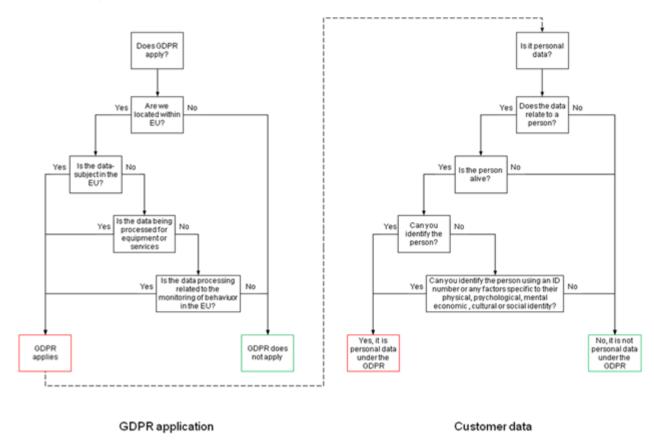


Figure 1 GDPR assessment process

#### 2 Consent

Following the GDPR assessment process, any instances where the GDPR are applicable will be reviewed. Wherever possible any affected records are simply deleted.

If GDPR applies and the records are still required, (for example among our own staff) the company will request new (or refresh existing) consent.

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#### 3 Data transparency and erasure.

Thruput do not engage with the general public or children in any way, nor does the company collect or record personnel data from among our vendors or customers. The company does not seek for, use or retain any data of a sensitive (or special category) nature from our own staff or the staff of our customers.

On request, the company will:

- Provide a digital copy of all personal data held for an individual, to the individual concerned.
- Delete all stored personal data about the individual, unless we need to keep that information for legal reasons, such as taxes or duties.

Please also refer to the section on Data security below.

#### 4 Purposes of data use.

Thruputs operates on a Business-to-Business trading basis only, and does not itself process, or control the processing by a third party, of any personal data.

The company data records comprise the designated points of contact for business operations within customer, vendor or regulatory organizations. In general, such contact details arise from meetings at trade shows, web-site enquires, telephone or email communications arising from the customer, vendor or regulatory organization for the purposes of equipment procurement.

## 5 Data security and breach notifications.

All contact details, account information of employees, customers, suppliers, and subcontractors are on the Company Server System. The system is secured by physical isolation and controlled password only access. It has no offsite access capability.

Thruput do not sell any personal data.

In the event of a data breach, Thruput will notify affected individuals and the Information Commissioner's Office within 72 hours as follows:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

T: 0303 123 1113 F: 01625 524 510

W: https://ico.org.uk/for-organisations/report-a-breach/

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### **Point of contact**

For any matters connected with GDPR or data privacy, please contact Thruput using any of the following:

**Thruput Limited** 6 Whitworth Road, Marston Trading Estate, Frome, Somerset, BA11 4BY, United Kingdom.

T: +44 (0) 1373 300 818 W: www.thruput.co.uk E: info@thruput.co.uk

#### 7 **Glossary**

GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office

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