



Fragrance Oils

---

## COMPANY GDPR


### POLICY AND PROCEDURE

---

#### POLICY SCHEDULE

Policy Title	Company Privacy Policy
Policy Owner	Personnel

#### Policy versions and Reviews

Version Number	Implemented	Reviewed	Signature	Position
1	March 2018	-		Data Controller

(This policy document will be reviewed at least annually).



Fragrance Oils

## **COMPANY PRIVACY POLICY**

### **POLICY STATEMENT**

Fragrance Oils (International) Limited and Group of Companies (Fragrance Oils) is committed to protecting the privacy of its employees, job applicants, customers, agents, distributors, suppliers and contractors and in complying with General Data Protection Regulations (GDPR) 2018.

#### **Policy purpose**

Our Company Data Protection Policy sets out our commitment to treat personal information with the utmost care and confidentiality.

The objective of this policy will ensure that we gather, store and handle data fairly, transparently and with respecting individual rights.

This policy refers to all parties (employees, job candidates, customers, suppliers, etc.) who provide any amount of information to us.

#### **Who is covered under the Data Protection Policy?**

Employees of Fragrance Oils must follow this policy. Contractors, consultants and any other external entity are also covered by this policy. Generally our policy refers to anyone we collaborate with or acts on our behalf and may need, or have occasion to access data.

#### **What information do we collect and what do we do with it?**

As part of our operations, we need to obtain and process information. This information includes any data that makes a person identifiable such as names, addresses, email addresses, phone numbers (landline and mobile), photographs, national insurance numbers, financial data etc.

We collect personal data in two ways:

- Directly from you
- Indirectly, through other sources

#### **Directly from you**

We may collect and use personal data that you provide when you interact with us.

For example, your business contact details, including your full name, contact details, your role within your company and your work experience, the country where you work, the products and services that are of interest to you and your company, your opinion and preference about a product, your communication preferences, your feedback about our services and our company.

We also collect information from the contact/customer detail forms that you complete.

# COMPANY PRIVACY POLICY

## Indirectly, through other sources

We also collect information about you indirectly, for example when you browse Fragrance Oils website, or through other technology that we make available to you. We may also collect information about you from publicly available sources such as information you make available on your company's website, or from public registries, such as Companies House.

When your company wishes to enter into a business relationship with Fragrance Oils, we may perform a third party due diligence process.

## We collect and use your personal data for our legitimate interest:

- to manage and maintain our business relationship, including to create and maintain an account in our systems, or to designate you as the contact person for specific business interactions (e.g. when you are designated as the person responsible for commercial questions, payments, etc.).

- to manage your orders; for example to ship and process samples and inform you about the status of your order.

- for customer care; for example to address any queries you may have and record and share internally within the company to provide a better service.

- to analyse your feedback and opinion; about our products and services to improve them or develop new ones.

- to manage your enquiries; for example when you contact us to provide new product samples, technical information and/or services.

- for recruitment; for example during our recruitment and employment process (subject to your consent).

## Our data will be:

- accurate and kept up-to-date
- collected fairly and for lawful purposes only
- processed by the company within its legal and moral boundaries
- protected against any unauthorised or illegal access by internal or external parties

## Our data will not be:

- communicated informally
- stored for more than a specific amount of time
- transferred to organisations, states or countries that do not have adequate data protection policies
- distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

## In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- let people know which of their data is collected
- inform people about how we will process their data
- inform people about who has access to their data
- have provisions in place in cases of lost, corrupted or compromised data
- allow people to request that we modify, erase, reduce or correct data contained in our database

# COMPANY PRIVACY POLICY

## Security

The security of your Personal Data is very important to us. Fragrance Oils will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to Personal Data.

If you have any questions or concerns relating to Fragrance Oils' use of your information and/or data protection, please contact the Company's Data Controller.

## Security of your personal data

We use security measures to protect against the loss, misuse and alteration of data used by our systems.

## Actions

To exercise data protection we are committed to:

- restricting and monitoring access to sensitive data
- developing transparent data collection procedures
- training employees in electronic and hard copy privacy and security measures
- building secure networks to protect electronic data from cyberattacks
- establishing clear procedures for reporting privacy breaches or data misuse
- establishing data protection practices (document shredding, secure locks, data encryption, password protection, frequent backups, access authorisation, etc.)

## Security – Reporting Fraud

We are committed to ensuring your information is secure. As part of our efforts to protect your information Fragrance Oils will never disclose your personal information to any third party unless prior consent has been received from you.

Should you receive emails asking for your personal information or are asked to disclose information by someone claiming to work for Fragrance Oils, please report the communication to our Data Controller immediately.

## Retention of your information

Fragrance Oils takes all reasonable steps to retain your personal information only for as long as reasonably necessary and will remove any personal information that is no longer required.

Fragrance Oils will only retain personal data for legal and/or operational reasons.

Once an individual has left the Company, or we no longer carry out business with a Company/Customer, all personal data will be confidentially and securely destroyed in compliance with statutory and legislative retention periods.

## Changing information we hold

If you would like to change the information we hold about you, or want your information removed from our database, please contact the Company's Data Controller.

# **COMPANY PRIVACY POLICY**

## **Changes to this policy**

This Policy is the Company's most recent version and is on our Web Site.

We may modify this Policy at any time without notice, except if such modifications contain substantial changes that may affect individual's rights under applicable privacy and data protection laws, in which case you will be notified of such changes at the beginning of this page.

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.