

## **Privacy Notice for RaySpec Ltd**

RaySpec Ltd is at the forefront of x-ray detector technology. In order to support our customers and work with our suppliers, we collect and process personal information. This privacy policy sets out how RaySpec collects and use information about our trade customers and suppliers in the course of our business.

RaySpec Ltd is based at Sirius House, Watery Lane, Wooburn Green, High Wycombe, Buckinghamshire, HP10 0AP, UK, and is part of the Polatechno group headquartered in Japan.

### **Personal Information Collected by RaySpec Ltd**

At RaySpec, the majority of the information that is collected and processed is non-personal data, relating to the technical specifications and arrangements for the supply of our product. RaySpec does not deal with consumers.

*Personal Information about our trade contacts:* in order to manage our trade customer and supplier relationships, RaySpec will collect and process personal information about individuals within the customer or supplier business including: name, occupation, employing company, title; office address and telephone number and business email address. Where a trade supplier or customer is trading as sole traders or partnerships, all the information that is processed by RaySpec about that business will be treated in the same way.

Customers and Suppliers may contact RaySpec by phone, email or in person to enquire about RaySpec's products, and data may be captured and recorded by RaySpec personnel.

### **How we use your information**

*Information on RaySpec Customers'* is used to respond to enquiries about RaySpec products, designs and specific orders; to manage and administer an order or business account; to handle payments for orders; to manage delivery of completed orders; to deal with quality and warranty issues, including any product recall, and support the development of products.

*Information on RaySpec Suppliers* is used to manage the business relationship to benefit RaySpec and its customers, to place and manage delivery of orders for raw materials, to deal with any supply or quality issues; to manage payments.

RaySpec does not envisage processing special categories of personal data relating to its customers and suppliers in its normal routine business activities, unless such information is volunteered by the customer or supplier.

The new data processing laws require RaySpec to set out the lawful legal basis for collecting and using personal data. One or more of these bases may apply:

- RaySpec processes information for the purpose of conducting negotiations to enter into a contract, and perform a contract with customers and suppliers;
- RaySpec processes information as required by law, and to protect, defend or enforce RaySpec's legal rights, including rights under its terms and conditions.

- RaySpec will process information to support its legitimate business interests where this will not impinge on the privacy of individuals, including to monitor performance and ensure that its high standards of performance and delivery are maintained across the business; to grow and develop the business; to manage and administer the business including business performance, and RaySpec may use information for marketing and promotional purposes.

RaySpec Ltd is a wholly owned subsidiary of Polatechno Co Ltd. From time to time, information about RaySpec's business in the UK, including details of customers and suppliers may be shared with our parent company in Japan to support the administration of the group structure, and management of RaySpec in the UK. RaySpec Ltd takes reasonable steps to limit the personal data to the extent necessary to support a specific reporting functionality, and ensures that where personal data about customers or suppliers is required to be shared, that this sharing is undertaken in accordance with the requirements of the General Data Protection Regulations and UK data protection laws.

### **How long information is retained**

*Information on RaySpec Suppliers:* RaySpec will retain personal information about contacts at its suppliers whilst RaySpec continues to have an active relationship and for as long as RaySpec maintains a copy of each order. RaySpec will continue to store business information on the supplier's business and its relationship with RaySpec, including details of all raw materials or products supplied to enable RaySpec to manage its warranty commitments to its customers.

*Information on RaySpec Customers:* RaySpec will retain personal information about contacts indefinitely following delivery of each order to enable RaySpec to manage any warranty or support issues.

*Information on enquiries:* RaySpec will hold a record of all enquiries placed, for up to 12 months.

In the case of customers and suppliers, RaySpec will retain information for as long as is necessary for RaySpec to protect and defend its legal rights.

### **Keeping in Touch**

RaySpec will continue to contact trade customers and suppliers in connection with specific business orders as part of its routine business activities.

From time to time, RaySpec may contact customers with details of products that may be of interest. If an individual does not wish to receive any marketing communications, please contact [privacy@rayspec.co.uk](mailto:privacy@rayspec.co.uk)

### **Protecting and Sharing your information**

At RaySpec Ltd, most of the business activities are handled internally. Customer and Supplier accounts are managed in electronic and paper records, which are stored with UK and EU service providers. Where it is necessary or efficient for activities to be provided by an external supplier, and such supplier will have access to any personal data, RaySpec complies with its legal obligation to have a written contract in place to protect that personal information.

RaySpec Ltd does not sell data to third parties for marketing purposes; however, it may sell or provide copies of the data in its possession or control if bought or sold where this data is part of the assets of RaySpec Ltd to ensure continuity for the benefit of our customers.

RaySpec may share personal information about trade customers with credit reference agencies to verify identity; assess the customers financial position when considering requests for commercial credit terms or as part of any fraud-prevention activities. This is to protect RaySpec's legitimate business interests, and enable it to enforce its legal rights.

### **Individual Rights**

Under the data protection law individuals have certain rights in certain circumstances including the right to:

- Withdraw consent where that is the legal basis of processing
- Access personal data that is processed by RaySpec Ltd
- Rectify inaccuracies in personal data held by RaySpec
- Request data is erased or restrict certain processing activities
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by RaySpec

Not all of these rights will apply at all times. Please see the ICO website for further information on the above rights: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> If you have any concerns about how RaySpec handles your data, please contact **privacy@rayspec.co.uk** to allow RaySpec to investigate your concerns. Individuals also have the right to complain to the Information Commissioner's Office.

### **Changes to the Policy and Contact Us**

RaySpec Ltd may change its privacy policy from time to time, and will notify relevant individuals where this policy changes, and post information on line. This policy was published on 24 May 2018.

If you have any questions about how we use information, or the terms of this policy, please contact us by telephone at +44 1628 533060, or by email to [privacy@rayspec.co.uk](mailto:privacy@rayspec.co.uk)