

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Lead is responsible for ensuring that this notice is made available to data subjects prior to Crawford Scientific Holdings Ltd collecting/processing their personal data.
- 2.2 All Employees/Staff of Crawford Scientific Holdings Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Crawford Scientific Holdings Limited is engaged with the provision of goods and services in the field of Analytical Chemistry. We provide goods, training and consulting services for analytical chemistry laboratories via Crawford Scientific Limited. We provide contract analytical services via Hall Analytical Limited. Our other leading brand is the online training platform CHROMacademy which is sold and marketed by Crawford Scientific Limited and our business partner UBM (formerly Advanstar Communications, Inc.).

Our Data Protection Officer / GDPR Lead and data protection representatives can be contacted directly here:

Tony Taylor (Technical Director)
tony@crawfordscientific.com
+44 1357 522961

The personal data we would like to collect from you is:

Personal data type:	Source (where Crawford Scientific Holdings Ltd obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Business e-mail address	Direct customer contact
Business address	Direct customer contact
Business telephone number	Direct customer contact
Type of instrumentation and consumables used	Direct customer contact
Type of analytical applications you work on	Direct customer contact
Your usage and assessment statistics within the CHROMacademy platform	CHROMacademy Database

Your order history and relevant ordering details	Crawford Scientific Website, CRM or accounting systems
--------------------------------------------------	--------------------------------------------------------

The personal data we collect will be used for the following purposes:

- Providing direct marketing which is relevant to your work and requirements
- Allowing access to our websites (www.crawfordscientific.com, www.chromacademy.com)
- Providing you with CHROMacademy content updates and events on CHROMacademy
- Allowing legal compliance for the contracts that we enter into with you and your business
- CHROMacademy LITE Member Details and CHROMacademy Webcast Registrant details may be passed to third parties whose products and/or services we think you may be interested in. However this will only be done with your positive and informed consent.

Our legal basis for processing for the personal data:

- Your direct consent (for direct marketing)
- As part of our contract for CHROMacademy LITE and PREMIER members
- Legitimate Interest for those customers who regularly interact with our marketing, sales teams and who place regular orders with our businesses

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Customers who place regular sales orders with us for products or services
- Customers who regularly interact with our marketing (past 12 months)
- Customers who regularly interact with our sales teams (past 24 months)
- Customers who are PREMIER and LITE members of CHROMacademy

The special categories of personal data concerned are:

- We do not collect any special categories of personal data

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Crawford Scientific Holdings Ltd to process personal data, but it must be explicitly given.

You may withdraw consent at any time - contact the GDPR Lead (details in Section 3.1) for a copy Consent Withdrawal Form ([GDPR REC 4.6A](#)) or to request a Subject Access Request Form ([GDPR REC 4.2](#))

Our Consent Withdrawal Procedure (GDPR_DOC_2.7A) and Subject Access Request procedure (GDPR_DOC_2.2) can be requested from the Data Protection Officer / GDPR Lead (see Section 3.1 for relevant details)

3.3 Disclosure

Crawford Scientific Holdings Ltd will only pass on your personal data to third parties when you sign up for CHROMacademy LITE membership or when registering for CHROMacademy webcast events but only after you have given us permission to do so. We share details on CHROMacademy Premier members so that we can administer your account and fulfil our contractual duties to you.

With the exception of the above, we do not share customer personal data with any third parties.

The following third parties will receive your personal data for the following purpose(s) as part of the processing activities (CHROMacademy members only):

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
UBM Life Sciences Group (formerly Advanstar Communications Inc.) (New Jersey, USA)	Data Controller & Data processor Contracts / Encrypted Transfer of Information	On request from the GDPR Lead

3.4 Retention period

Crawford Scientific Holdings Ltd will process and retain personal data for a reasonable time in order to fulfil our contractual obligations with you and to inform you of relevant products and services. For full details of our Retention of Records Procedure please ask to see a copy of [GDPR DOC 2.3](#) Retention Period Procedure. We will keep you on record for a period of 24 months following our last contact with you unless you request to be removed using our Consent Withdrawal Form ([GDPR REC 4.6A](#))

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.

- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Crawford Scientific Holdings Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

You should contact the GDPR Lead (details in Section 3.1) for a copy of our Consent Withdrawal Form ([GDPR REC 4.6A](#)) or Subject Access Request Form ([GDPR REC 4.2](#))

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Crawford Scientific Holdings Ltd (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Crawford Scientific Holdings Ltd's data protection representatives Data Protection Officer / GDPR Lead.

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Information Commissioners Office	Tony Taylor
Address line 1:	Wycliffe House	Crawford Scientific
Address line 2:	Water Lane	Holm Street
Address line 3:	Wilmslow	Strathaven
Address line 4:	Cheshire	Lanarkshire
Address line 5:	SK9 5AF	ML10 6NB
Email:	https://ico.org.uk/for-the-public/raising-concerns/	tony@crawfordscientific.com
Telephone:	0303 123 1113	01357 522961

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Crawford Scientific Holdings Ltd, will collect and use your personal data for;

- Providing direct marketing which is relevant to your work and requirements
- Allowing access to our websites (www.crawfordscientific.com, www.chromacademy.com)
- Providing you with CHROMacademy content updates and events on CHROMacademy
- Allowing legal compliance for the contracts that we enter into with you and your business
- CHROMacademy LITE Member Details and CHROMacademy Webcast Registrant details may be passed to third parties whose products and/or services we think you may be interested in. However this will only be done with your positive and informed consent.

Why does Crawford Scientific Holdings Ltd need to collect and store personal data?

In order for us to fulfil our contractual duties with you, manage our direct mailing and marketing, conduct business and to manage our CHROMacademy membership information we need to collect some personal data from you. In any event, we are committed to ensuring that the information we collect and use is appropriate for these purposes, and does not constitute an invasion of your privacy.

Will Crawford Scientific Holdings Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Crawford Scientific Holdings Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Crawford Scientific Holdings Ltd's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Crawford Scientific Holdings Ltd use the personal data it collects about me?

Crawford Scientific Holdings Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Crawford Scientific Holdings Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Crawford Scientific Holdings Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Crawford Scientific Holdings Ltd at your request, can confirm what information we hold about you and how it is processed. If Crawford Scientific Holdings Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Crawford Scientific Holdings Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

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- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Crawford Scientific Holdings Ltd accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months)

Contact details of the Data Protection Officer / GDPR Lead:

	Data Protection Officer / GDPR Lead contact details
Contact Name:	Tony Taylor
Address line 1:	Crawford Scientific
Address line 2:	Holm Street
Address line 3:	Strathaven
Address line 4:	Lanarkshire
Address line 5:	ML10 6NB
Email:	tony@crawfordscientific.com
Telephone:	01357 522961

Document Owner and Approval

The Data Protection Officer / GDPR Lead is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on all Crawford Scientific Holdings Ltd entity company Intranet Sites. Privacy Statements will be published on all Crawford Scientific Holdings Ltd. company websites.

This procedure was approved by the Data protection Officer / GDPR Lead on 15th May 2018 and is issued on a version controlled basis under his/her signature.

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Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Tony Taylor	15/5/18