

## General Data Protection Regulation (GDPR)

and the Data Protection Bill (to repeal and replace the Data Protection Act, 1998)

## Privacy Notice – Commercial Activities

### Data Controller

**Anthesis Limited (AS Global)**

Person with responsibility for data protection compliance  
within the Company

**Tom Constantine, Director,**

who can be contacted via email at [dpo@anthesis.co.uk](mailto:dpo@anthesis.co.uk)

## What information does Anthesis collect?

1. Anthesis Limited (Anthesis, the Company) collects and processes personal data and information as an integral part of its wide-ranging commercial and business development activities. This Notice tells you how Anthesis manages any personal information it holds about you.
2. Anthesis is committed to meeting its data protection obligations. If you decide to give us personal information as part of establishing or maintaining a commercial and/or business relationship, this information will be held and processed by Anthesis in accordance with the General Data Protection Regulation.

As part of this, the Company recognises the proper obligations upon it to protect your privacy. The Company is also committed to being transparent about how it uses the personal information collected as part of its commercial and business development activities.

3. Anthesis collects and processes a range of information about you. This includes your name, your Company and/or employer's name, your job title, your business address, and your business contact email address, telephone numbers, and social media contact details.
4. Anthesis collects this information in a variety of ways. You may have chosen to give us the personal information because you wanted Anthesis, or one of its two strategic partners, Industrial & Financial Systems (IFS) and Infor, to process a business request for you. These types of request often include, for example,

providing you with information about the Company's products or services, or to provide a business proposal and/or quotation, or to place an order or commission a contracted assignment.

You may have given us your personal information by direct contact with Anthesis, initiated by you. Alternatively, you may have given us your personal information as part of a business meeting or as part of the wide range of professional conference, networking, and business referral activities that Anthesis participates in.

Anthesis does not generally collect personal information about you from third parties. Where this does occur, Anthesis will only do this with your prior consent. Anthesis will also let you know if personal information about you is collected from other open or public sources, including the internet and social media platforms.

5. Personal information about you will be stored in several different places. These include the Company's commercial contact database, the Company's marketing and sales database, the Company's email system and the mobile telephones provided to and used by Company employees.

## Why does Anthesis process personal information?

6. Anthesis offers a range of business and commercial services which, if you choose to use them, will require information from you to work. The Company collects, controls, and processes personal information for several purposes, including –
  - To process information as part of entering into a commercial contract with you and/or your employing organisation, and to meet its obligations under any such contract, including IT log-on details, and payment and related financial transactions
  - To process and perform the services you have requested, including the supply of business-related information about Anthesis and the Company's range of products, services, and opportunities
  - To help the Company to create and deliver content that will be most relevant to your business needs
  - To alert you to new services and other business-related information, unless you have opted-out of receiving such information
  - To make on-going contact between you and Anthesis easier, by not requiring you to enter your personal information more than once
  - To enable the Company to undertake standard business analysis, including charting business development trends to inform future marketing and sales plans, and to inform the future development of the Company's services

This commercial and business-related information relates to the products and services available from Anthesis and the Company's strategic business partners, IFS and Infor.

7. Anthesis recognises and respects that personal information will only be used for the purposes for which it was supplied. The Company also recognises that you may not wish to be contacted again after the original reason for establishing contact has been fulfilled.

You can opt-out of receiving information from Anthesis at any time by contacting Tom Constantine, Director, via email at [dpo@anthesis.co.uk](mailto:dpo@anthesis.co.uk) You can opt-out from receiving all information from the Company, or from receiving specific categories of information designated by you.

### Who has access to the information?

8. Your personal information will be shared internally with Company employed colleagues where access to the data is necessary for the performance of their job roles and the delivery of service to you.
9. In circumstances where Anthesis is entering into a commercial contract and/or business delivery assignment with you and/or your employing organisation, Anthesis will need to share your personal information with designated third parties to enable the contract and/or work to be performed. This most commonly involves use of Anthesis Partners, Agents, or Consultants working under a contract for service with Anthesis. In such circumstances your personal information will only be provided to such third parties with your prior consent.
10. Anthesis may disclose your personal information to others in connection with any legal or prospective legal proceedings, and/or in order to establish, exercise or defend the Company's legal rights.
11. Anthesis will not, without your express prior consent, provide your personal information to any third parties for the purpose of direct marketing.
12. Anthesis operates on a global basis, as part of the Enterprise Resource Planning (ERP) sector. The information that the Company collects may be stored, processed in, and transferred between any of the countries in which Anthesis and/or its' client organisations operate.

Subject to the Company's standard internal security arrangements, the information can be accessed from anywhere in the world. In all circumstances the information will be controlled and processed in accordance with the provisions of this Privacy Notice.

### How does Anthesis protect data?

13. Anthesis takes very seriously the security of the personal data and information it controls and processes for commercial and business-related purposes.

The Company takes all reasonable technical and organisational precautions and measures to prevent loss, accidental destruction, misuse, alteration, or disclosure of your personal information. These measures include use of a secure databases, together with internal policies and systematic updating of the controls to protect personal data. These internal controls also ensure that access to personal information is restricted, and cannot be accessed other than by properly authorised persons in the proper performance of their duties with Anthesis.

All Company employees and Partners, Agents, and Consultants are properly briefed about the responsibility to keep your personal information secure.

Data transmission over the internet is inherently insecure. Anthesis cannot guarantee the security of data sent over the internet.

14. Anthesis does not buy or sell personal information.
15. Where the Company engages third party Partners, Agents, or Consultants to process personal information on its behalf, such parties operate in accordance with the appropriate Anthesis control policies and arrangements. Additionally, the contract for service with such Associates includes express duties of confidentiality and non-disclosure, together with an obligation to implement appropriate technical and organisational measures to ensure the security of personal data and information.

### **For how long does Anthesis keep personal information?**

16. Anthesis will hold your personal information for the duration of your commercial and business-related contact with the Company.
17. Anthesis will hold your personal information after the end of your commercial and business-related contact with the Company for 6 years, in accordance with the UK Limitation Act. In the case of financial information, the retention period will be 6 years from the end of the financial year in which the transaction was made. After this period the information will be archived or safely destroyed.

### **Your individual rights and responsibilities**

18. As a data subject, you have a number of rights. You can -
  - Access and obtain a copy of your personal information on request
  - Require the Company to change incorrect or incomplete personal information
  - Require the Company to delete or stop processing your personal information eg where the information is no longer necessary for the purposes of processing
  - Object to the processing of your personal information where the Company is relying on its legitimate interests as the legal ground for processing

19. If you want to exercise any of these rights, please contact Tom Constantine, Director, via email at [dpo@anthesis.co.uk](mailto:dpo@anthesis.co.uk) Tom is the person with responsibility for data protection compliance within the Company.

20. The Company recognises that the personal information it holds about you is likely to change over time. You may change your employer, or your job role and contact details may change.

Anthesis will, as part of its normal good housekeeping, undertake appropriate data up-dating and cleansing operations. However, if the personal information the Company holds about you needs to be corrected or updated, it is always helpful if you are able to promptly notify required changes via email to [dpo@anthesis.co.uk](mailto:dpo@anthesis.co.uk)

21. If you believe that Anthesis has not complied with your data protection rights, you can complain to the Information Commissioner.