

## 1. Scope

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This policy covers ABG business activities relating to sales and marketing activities. It should be read in conjunction with other relevant policies which address other aspects of data handling, such as HR responsibilities, financial dealings, website use etc.

## 2. General

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This policy has been prepared to outline how ABG meets General Data Protection Requirements (GDPR) in our routine communication with customers, clients and other contacts. It covers the main activities we undertake in day to day communications with our contacts. These activities include but are not limited to:

- Routine, day to day business to business sales activities, such as responding to customer enquiries, servicing orders, providing professional services such as technical support and so on.
- Accounting and financial dealings with clients and customers using our services.
- Bulk email marketing activities to our contact databases.

ABG policy is to conduct our activities in line with current data protection policies and good practice guidance. It is our intention to make our data protection processes and policy as transparent as possible. Any data held or processed by ABG is done so under the GDPR lawful bases for processing. In the majority of cases this will be Consent, Contract, Legitimate Interest, or Legal Obligation.

We will seek to respond to any enquiries about data protection under GDPR, including:

- Your right of access to personal information records
- Your right to correct data
- Your right to be forgotten, for records to be deleted
- Your right to withdraw your consent for processing at any time
- Your right to complain to the Information Commissioners Office

ABG do not share or sell information about our contacts or customers with any third parties, except where we are required to do so by law.

In the unlikely event of a security breach we will communicate with affected contacts as soon as practicable. From our understanding of GDPR regulations the data we hold for Sales and Marketing activities would be deemed as low risk in relation to our contacts.

Any questions or concerns can be raised with any ABG contact at any time, or put direct to Alek Jovetic, our Data Controller via [info@abgltd.com](mailto:info@abgltd.com).

## 3. Bulk Email

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ABG has undertaken bulk email marketing for a number of years. We have never had any desire to send unwanted emails, and all emails carry an unsubscribe option. We use dedicated bulk mailing software to manage and maintain contact lists appropriately.

The data held in these lists is generally limited to email address, name and organisation, and it is our policy to hold only the minimum data required to undertake our marketing activities.

As well as our own databases ABG may occasionally use information provided by third parties to supplement our databases. One example of this is following a technical seminar where attendees require certification to contribute to their CPD requirements ABG may be provided with contact information to issue certificates.

We may also purchase data from third party providers to promote a particular event or product range to a particular market, such as a seminar or exhibition.

Whether data is acquired directly or via a third party ABG will undertake to ensure that the data supplied to us has been gathered in accordance with GDPR requirements, is from a legitimate source, and has the necessary permissions for our intended use.

All bulk emails include a simple unsubscribe option allowing recipients to unsubscribe from any or all ABG mailing lists. Alternatively you can contact our data controller Alek Jovetic at [info@abgltd.com](mailto:info@abgltd.com).

## 4. CRM

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ABG uses a Customer Relationship Management (CRM) system to store and manage details about our interactions with customers. This information includes personal data such as name, address, email, phone number and other relevant details. We also keep records of enquiries received, advice and quotations provided along with other detail relevant to the day to day activities of our business.

We do not capture or retain data unless it is necessary for conducting our business. Data relating to home address, health, relationships, sexual orientation, financial information, and any other such non-business related information is not captured or retained.

Our CRM data is held on a secure server and can only be accessed by authorised users who require it in the course of doing their job. Our product range is supplied with an expected design life that can be in excess of 120 years, which means we may have an obligation to retain details of information provided to and provided by ABG for that length of time. After this period data that is not required to be retained by law will be destroyed.

## 5. Website

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Our website [www.abg-geosynthetics.com](http://www.abg-geosynthetics.com) uses cookies and tracking services (such as google analytics) to enable us to monitor use of the site and ensure it stays relevant to our customers. Much of this data is anonymised, but not all. For example where a contact request form is filled in, or access is required to a members only area of the site we need to identify the individual.

Cookies can easily be deleted from their browsers by users of the website as per our Cookie Policy.

## 6. Accounting and Financial Dealings

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ABG Sales and Marketing functions do not retain any financial information, banking or other finance related details. Any such information retained by Finance is covered in a separate policy.

## 7. Any Questions?

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Fundamental to ABG's data protection and processing policies and practices is our desire to do the right thing and to make sure our activities are beneficial to our clients and contacts. If you have any questions or concerns about our work or data protection issues please speak to your ABG contact on 01484 852 096, or get in touch with our Data Controller, Alek Jovetic at [info@abgltd.com](mailto:info@abgltd.com).