

Oxford Digital Ltd Privacy Policy

1. Summary

Oxford Digital is a UK-based company specialising in audio processing for semiconductor manufacturers, consumer equipment designers and professional audio manufacturers.

The company collects, stores and uses contact and other information as an essential part of its operations. In accordance with the new General Data Protection Regulation (GDPR), the company has reviewed the purpose of its data processing activities and determined the lawful basis for each activity.

We believe that the company complies with all legislation and where there are judgements to be made, we have applied the principle of proportionality.

Oxford Digital aims to treat all its contacts in an open, respectful and courteous way. We will amend or delete personal information at the request of the data subject.

2. Lawful basis for data processing: legitimate interest assessment

We believe that our collection and use of contact information (primarily email and postal addresses) conforms to the guidance from the Information Commissioner's Office (ICO) "Legitimate interest is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing".

We have applied the ICO tests as follows:

2.1 identify a legitimate interest

Our legitimate interest is the dissemination of information relating to technological advances made by Oxford Digital.

2.2 demonstrate that the processing is necessary to achieve it

The processing is primarily the collection, storage and responsible use of email addresses in order to inform people about Oxford Digital's technology; we collect this information only where we have good reason to believe that the subject is interested in the company's activities.

2.3 balance it against the individual's interests, rights and freedoms

Since Oxford Digital does not hold passwords, or especially sensitive information relating to its contacts, the use of personal data is considered to be low risk.

We consider that sending information by email is not intrusive as emails can easily be deleted and we provide means to unsubscribe. We consider that recipients benefit from the company's processing of data in order to send email information about Oxford Digital's technology.

Overall we consider our practices to be proportionate given the objectives of the GDPR and that we have obtained a good balance in our use of personal information.

3. Data handling

3.1 Data Controller

John Richards: White Oak, West End, Combe, Witney OX29 8NP; john.richards@oxford-digital.com

3.2 Data Processors

John Richards: White Oak, West End, Combe, Witney OX29 8NP; john.richards@oxford-digital.com

Jean Richards: jean.richards@oxford-digital.com

4. Collection of information

Oxford Digital collects information on people interested in the activities of the company in the following ways:

- in person from people attending trade shows, exhibitions and conferences;
- in person from requested company visits;
- electronically from people who contact us by email asking to be kept informed of company activities;
- we have previously added to our contacts list, from time to time, details of people whom we have reason to believe will be interested in receiving information on Oxford Digital. We have retained this information under the provisions of Article 6.1(f) of GDPR in pursuit of our "legitimate interests" in providing information about our technology.

Oxford Digital does not purchase lists of marketing contacts.

5. Information handling

5.1 Access to information

Oxford Digital will be happy to provide anyone with copies of the information that is held about them. Requests should be sent to the Data Controller, John Richards.

5.2 Disclosure and erasure

Oxford Digital does not disclose personal information to other persons or organisations. If a request is received for contact information for a specific individual, the company will contact the individual in person to determine whether that information may be provided.

If a data subject asks explicitly to have their personal information deleted the company will delete this information from its mailing list but their name and related details will remain in our accounting system and bank records as required by other regulations.

The company will keep a record of all explicit requests for the deletion of personal information.

5.3 Correction and updating

Oxford Digital will correct and update any information as soon as reasonably possible after being informed of the need to do so.

6. Personal data audit

6.1 Data stored

Oxford Digital holds the following personal data:

- a mailing list of names and e-mail addresses for sending information about forthcoming Oxford Digital activities that are likely to be of interest

- information from suppliers (some or all of: name, address, e-mail address, telephone number, bank account information)

Oxford Digital does not store dates of birth, health or other sensitive personal information. The company does not issue or store passwords relating to its data subjects.

6.2 Means of storage

Personal data is stored on the hard drives of the data controller and data processors, accessible only under password.

6.3 Period of storage

Contact information stored for the purpose of sending out information about Oxford Digital's activities will be stored for as long as it appears to be useful, or until the data subject requests its erasure, whichever is the shorter.

6.4 Backups and deletions

Oxford Digital makes regular back-ups and retains sets of backed-up data. In the event of a request for erasure, it will not be practicable to erase data from all the back-ups but the data will be erased from the current record and the erasure recorded such that if there is a need to use backed-up data the relevant items will be erased from the backed-up data when it is restored.

7. Complaints

If you have any concerns about the way in which Oxford Digital processes personal information, please address your concerns to the company's data controller John Richards.

You are also entitled to make a complaint to the Office of the Information Commissioner, see <https://ico.org.uk/concerns/>

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