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## Toiletry Sales Group and Subsidiaries (TSL)

### Statement on GDPR

#### Notice regarding personal details held in relation to our trading relationship

On 25 May 2018 the UK enacts the General Data Protection Regulation (EU) 2016/679 which provides a much stronger regulatory environment with respect to the management, control and protection of Personal Data.

#### Customer, Partner and Stakeholder Data held by TSL

Toiletry Sales Ltd (TSL) and its associated subsidiaries is classified as a data controller under this new GDPR legislation. As a data controller we need to process personal data to allow us to run our business effectively. Aside from the information we store on our staff we also hold personal information for our suppliers, customers and very occasionally consumers (stakeholders). This personal (identifiable) information (PII) in most cases is limited to contact names, addresses, email addresses and phone numbers. We hold this information in order to run and maintain an efficient business. In some circumstances we hold more information to conduct investigations into issues. This information can hold more sensitive PII. In these cases we have specific processes in place to ensure that this information is anonymised wherever possible to minimise the risk of data loss. Where we cannot (or for reasons of need should not) anonymise the data we ensure that any data which could be used to identify an individual is controlled, held securely and has limited authorised access.

Each person who we hold PII information on has specific rights under GDPR. This includes the right to be informed, right of access to your data, right to rectification, the right to erasure, the right to restrict processing, the right of data portability, the right to object or the rights in relation to automated decision making and processing. If you would like to exercise any of your rights regarding your personal data please contact our Data Protection Officer. The contact details are at the top of this letter. When we receive your request we will acknowledge receipt of it within 72 hours and will provide a detailed response within 1 month. At the time of your request we may need to ask for more information in order to process it. This will be done at the time of acknowledging your initial request.

All of the data we store including the applicable retention period is detailed in our data retention policy. This can be downloaded from our website along with our privacy policy and data protection policy. If you have any queries or questions regarding any of these policies please contact our Data Protection Officer at the above address.

We do not share any of your data with third parties but may share the information with other TSL employees in order for them to maintain the business services we provide. All of the data we hold is stored within secure systems and is only accessible using encrypted devices which are maintained and controlled by TSL.

If you feel TSL are using your personal data incorrectly or inappropriately then please contact our Data Protection Officer at the above address. The Data Protection Officer will work with you to rectify any problems with haste, efficiency and also transparently, or, reassure you that TSL have acted appropriately and within the guidelines of GDPR.

If you are not happy with the response of the Data Protection Officer you may also make a complaint either directly to myself or to the governments information commissioner at [www.ico.org.uk](http://www.ico.org.uk)

#### Personal Data of TSL employees held by your company

We understand that our Customers, Suppliers, Partners and Stakeholders will also hold similar PII data for TSL staff which is used to maintain effective business operations and relationships between our two businesses. In such cases you will be acting as the Data Controller for TSL's personal (PII) data. We expect you to control, maintain and protect the security of TSL's PII data in compliance with the GDPR regulations and notify TSL immediately of any breaches including the remedial action being taken to



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both correct and prevent reoccurrence so we can support our staff in best way possible. We reserve the right to request details regarding the policies you have in place to maintain and control TSL data within your business.

We request that you do not pass or redirect any PII data to any third parties without TSL's written consent. If you do have a business need to send PII data to a third party please contact TSL immediately to inform us of the data you wish to send out, the business rationale and the lawful basis (Consent, Contract, Legal Obligation, Vital Interest, Public Function and Legitimate Interest) under which you consider such personal data can be shared. No data must be sent or shared with any 3<sup>rd</sup> party until TSL has approved such a request.

From time to time a TSL employee may (directly or through TSL management) make a specific request to you about their own personal PII data which is their right under GDPR legislation. On such an occasion we would expect you to react efficiently and promptly in order to deal with such a request.

TSL reserves the right to complain to the Information Commissioner and/or in rare and extreme cases review our business relationship should you commit a material breach of the GDPR legislation which results in significant harm coming to a TSL employee, partner or stakeholder of our business.

Chris Patterson

Chief Executive Officer