

Lenstec

Lenstec (Barbados) Inc in the United Kingdom are an overseas branch of Lenstec Inc based in Florida, USA. Lenstec have a purpose built 30,000 square feet manufacturing facility in Barbados where Intraocular Lenses and consumables are made for use in cataract and refractive surgery throughout the world. The Lenstec (Barbados) Inc office based in Wakefield, West Yorkshire supply NHS and Private hospitals throughout the UK and Ireland.

Introduction

The EU's new data privacy law, the General Data Protection Regulation (GDPR), goes into effect on May 25, 2018, and applies not only to EU-based organizations, but also to anyone who has customers or contacts in the EU.

The General Data Protection Regulation replaces the EU Data Protection Directive 1995 and supersedes the laws of individual member states that were developed in compliance with the Data Protection Directive 95/46/EC.

Its purpose is to protect individual's data and ensure that personal data is not kept or processed without their knowledge and wherever possible, is processed with their consent.

Personal Data Definition

Any information relating to an identified or identifiable person (Data Subject). An identifiable 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 physical, genetic, mental, economic, cultural or social identity of a person.

Contacts and Responsibilities

The responsibility of this policy lies with the appointed Data Protection Officer (also known as Commercial Services Manager).

All staff are responsible for:

- Checking that information retained is within the law.
- Only retaining information necessary to Lenstec.
- Keeping information up to date and accurate.
- Deleting / destroying out of date contact information once the retention period has passed

Lenstec state that personal data shall:

- Be adequate, relevant and not excessive for the purpose.
- Not be kept longer than necessary.
- Be processed in accordance with the data subject's rights.
- Never be passed onto a third party.

Retention Policy

Lenstec will retain customer information for as long as the account is active with sales plus six years thereafter to meet any legal obligations. After this time the information will be destroyed.

Data Storage

Lenstec's emails, data files and CRM data base are stored on a secure server located in Florida, USA (Head Office).

All Lenstec employees are assigned their own PC/Laptop within the office, that is protected with a password made by each employee.

Passwords are updated every 90 days and must meet specific criteria. Users will have 3 attempts to enter a password before being locked out of their machine.

Consent

Customer information is gained via purchase orders, sales enquiries, meetings and quotations. By contacting or ordering products from Lenstec you are added to the CRM database (SAP) in order to record information necessary to the running of the business. This is hereby taken as consent to information being retained. Only basic necessary personal information such as, full name, title/department, email address and contract numbers are recorded.

Data Access Requests

At any time, you may request a copy of the information held by Lenstec about you, as well as how the information is stored and used by Lenstec.

This request can be made in one of the following ways for the attention of the Data Protection Officer;

- **Email** – lenstecuk@lenstec.com with the subject line "GDPR Data Access Request"
- **Post** – Lenstec House, Unit 8. Mariner Court, Calder Park. Wakefield. WF4 3FL
- **Telephone** – UK landline +44 (0)1924 382678

Proof of identity may be requested from you, by Lenstec before the information is released to ensure the information is not being unknowingly shared with a third party.

Once the information has been sent to you, you have the right to request that the information held by Lenstec is;

- Rectified / Edited / Updated
- Forgotten / Deleted
- Restricted to being used in certain ways / on certain documentation

All GDPR or data access requests made to Lenstec must include the full name or company name in question and the way in which you wish to be contacted in response.

Lenstec will retain copies of any data access requests in a secure file managed by the Data Protection Officer only. Alternative contact information received within a data access request will not be added to any CRM or customer database and will be used for the purpose of responding to the request only.

Data access requests will be retained for a period of 12 months and destroyed thereafter.

Marketing Database

A separate marketing database is held by Lenstec on a secure website (Mailchimp) used for sending promotional or product information. The email addresses retained and used for this purpose have all “Opted-In” to a subscription request sent before 25th May 2018. Requests to be removed from this data base can be made through an “Opt-Out” button at any time. Customers can also sign up to this database using a link available on Lenstec employee’s email signatures.

Closing Notes

Lenstec reserve the right to make changes to this policy at any time should it be required. Records of any amendment will be recorded below, and all previous revisions shall be held on file by Lenstec.

Lenstec plan to test and review this policy annually, to ensure it is consistent and effective for its purpose.

Revision Number	Date Changed	Confirmed By
REV 1	25.05.2018	Data Protection Officer
REV 2	04.12.2018	Data Protection Officer
REV 3	15.04.2021	Data Protection Officer