

Privacy Policy

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What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data. We will only hold and process your personal data on one or more of the grounds authorised by the GDPR.. We will be the data controller of any personal data which we collect from or about you. Please read this Policy carefully. By contracting with us, you acknowledge that your personal data will be used in accordance with this Policy.

1. SonexAsia Ltd issue this joint Privacy Policy.

Our aim is to be transparent with how we use your data Under the General Data Protection Regulation (GDPR),

2. Information we collect - Your full Name, Occupation, Organisation, Email and Telephone contact details, which will be stored in a protected environment and will not be shared with third parties for other uses other than for the legitimate purposes listed below.

3. How we Collect Data - We will collect information from you when you become our customer or supplier, or contact us in person, by telephone, by e-mail, by post, by fax or by social media. We may monitor images of you on cctv when you visit our premises. We also collect information from you when you provide feedback or complete a contact form on our website.

We may collect information about you from credit reference agencies when we undertake checks such as credit and identity checks. We may collect information about you from online information platforms (such as Google).

Information may also be collected about you when you visit our website (for example via cookies), such as your IP address and other browser-generated information.

We may record calls to enable us to deal effectively with queries or complaints.

SonexAsia Ltd.

Hong Kong office:
Room E, 6th Floor,
Eastern Commercial Centre
395-399 Hennessy Road
Hong Kong

Shanghai office:
No 558 Huanan Road
Huaxin, Qingpu
Shanghai
China

T +86 21 697 914 71
F +86 21 697 914 78
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4. Using your Data-

We use information held about you in the following ways:-

- to undertake checks such as credit and identity checks to enable us to comply with our anti-money laundering obligations and for the purposes of assessing our credit risk;
- to comply with our contractual obligations to you;
- to help protect your information and prevent unauthorised access to it;
- to deal with any queries, complaints or problems reported by you;
- for payment verification, debt tracing and debt recovery;
- [to enable you to participate in our promotions or competitions;]
- to enable you to participate in the interactive features of our website and to ensure that content from our website is presented in the most effective manner for you and your computer/device;
- to generate statistics relating to use of our website;
- to provide you with information about other goods or services we offer that are similar to those that you have already contracted with us to provide, or enquired about. You may opt out of receiving this information when we collect your details or at any time by contacting us using the contact details below;
- if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or to enforce the terms of any contract that we have entered into with you;
- to notify you of changes to our terms of business;
- [to ensure that our premises are secure and remain a safe working environment.]

Our use of your personal data will be for one or more of the legitimate interests described above.

5. HOW WE SHARE YOUR PERSONAL DATA:-

We may disclose your information:-

- to businesses that are part of the same group of companies as us, or that become part of that group;
- to our IT providers and others who provide us with support services (such as shipping and delivery contractors) so that we can comply with our contractual obligations to you;
- to our appointed accountants, lawyers and other professional advisers (including our bankers), to the extent that they require access to the information in order to advise us;
- to credit reference agencies and other organisations to allow us to undertake the checks set out below;
- to debt collection agencies or to the Court;

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- if required to do so by any legal requirement;
- to law enforcement agencies and others in order to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable laws;
- to HMRC if obliged to do so by law, who may pass this on to tax authorities in other jurisdictions; or
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers and suppliers may be one of the transferred assets.

We will not disclose your information to third parties other than as outlined above.

6. DATA SECURITY-We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to employees of SonexAsia who may access your data on a need to know basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7. Holding your data -

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected, as set out above in this Policy, and for as long as we are required to keep it by law.

We retain personal data collected in connection with the performance of our contractual obligations to you and the information provided to us for identity checks and anti-money laundering checks for 7 years after performance of our contract with you. You may require us to delete personal data once that period has expired unless we are required to retain that personal data for a longer period by law.

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure.

We may transfer, or allow access to, your information internationally including to countries outside the European Economic Area (EEA) when performing our contractual obligations to you. We will ensure that your personal data is adequately protected when it is transferred outside the EEA in accordance with applicable data protection laws.

You can update your personal data by contacting us.

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You may request to view, review, correct, delete or otherwise modify any personal information that you have previously provided to us at any time.

No fee required – with some exceptions You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you -We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond - We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

All correspondences from us allows you to unsubscribe/subscribe easily , Using methods of email, phone or post to header address

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data; **THE RIGHT TO WITHDRAW YOUR CONSENT TO THE PROCESSING AT ANY TIME, WHERE CONSENT WAS YOUR LAWFUL BASIS FOR PROCESSING THE DATA**
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

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- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

9. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

Your Duty & Responsibility - Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

10 How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our DATA PROTECTION OFFICER/CONTROLLER; peter@SonexAsia.eu

Telephone & Address: see header

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on www.SonexAsia.eu and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Cookies- You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

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