

# Generated privacy notice - general business

## Mongrel Thumb Limited, trading as Maxim Reston Voice - Customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

### Our contact details

#### Post

Mongrel Thumb Limited, 22 Lawrie Park Gardens, Sydenham, LONDON, SE26 6HL, GB

#### Email

maxim@maximreston.com

### What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Credit reference information
- Health and safety information
- Account information

- Information relating to loyalty programmes
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Call recordings
- Records of meetings and decisions
- Identification documents
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Location data
- Recorded images, such as photos or videos

- Call recordings
- Purchase or viewing history
- IP addresses
- Website and app user journey information
- Information relating to sponsorship
- Records of consent, where appropriate

We collect or use the following information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Location data
- Recorded images, such as photos or videos
- Call recordings
- Purchase or viewing history
- IP addresses
- Website and app user journey information
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Identification documents
- Financial transaction information

## Lawful bases

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent
- Contract
- Legitimate interest:
  - By using the customer's information Mongrel Thumb Limited is able to notify them of updates to our voiceover services and facilities which will be of benefit to the customer's own product. We thereby notify the customer in order that they can be aware of any new services which they may wish to avail themselves of in order to improve their own product and business with their customers.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent
- Contract

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent
- Contract
- Legitimate interest:
  - By using the customer's information Mongrel Thumb Limited is able to notify them of updates to our voiceover services and facilities which will be of benefit to the customer's own product. We thereby notify the customer in order that they can be aware of any new services which they may wish to avail themselves of in order to improve their own product and business with their customers. Customer's may then advertise these connections to their own clients in order to generate further leads and revenue.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent
- Contract

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Consent
- Contract
- Legal obligation

Where we get personal information from

- People directly
- Publicly available sources

How long we keep information:

**DATA RETENTION POLICY WITH SCHEDULE  
of  
Mongrel Thumb Limited (trading as Maxim Reston Voice)**

**Introduction**

As part of the day-to-day running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is stored both as a hard copy and in electronic form.

**Aims of the policy**

Our business will ensure that the personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods or/and services – as required by data protection legislation, including the General Data Protection Regulation (GDPR).

**Retention**

This retention policy (along with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

Decisions around retention and disposal are to be taken in accordance with this policy.

As and when the retention period for a specific document has expired, a review is always to be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration is to be given to the method of disposal.

### **Responsibility**

Mongrel Thumb Limited is responsible for keeping this retention schedule up to date in order to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business.

Mongrel Thumb Limited is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

Mongrel Thumb Limited may delegate the operational aspect of this function to Charles Edward Maxim Reston.

Charles Edward Maxim Reston should inform Mongrel Thumb Limited if there is any doubt about the minimum retention periods or if the retention of a document is necessary for a potential claim.

### **Disposal**

Our business must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- Transmission of records to an external body
- Cloud storage
- [LIST]

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Exceptional circumstances should be reported to Charles Edward Maxim Reston without delay.

Date created: 08/04/2024

Date of review: 08/04/2024

## Appendix 1: Document retention schedule

### Employment records

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
PAYE records	[3] years from end of fiscal year	Encrypted Hard Drive/Sage Online	Legal	File deletion
Maternity and paternity pay records	[3] years from end of fiscal year	Encrypted Hard Drive/Sage Online	Legal	File deletion
Medical and health records	[30] years after employment ceases	Not stored	N/A	NA
Unsuccessful candidates	[6 months] after last action	Not stored	NA	NA
Accident report forms	[3] years after last action	Encrypted hard drive	Legal	File deletion
Parental leave records	[5] years from birth of child	Not stored	NA	NA
Employment records: redundancy, equal opportunities; health & welfare records	[6] years after last action	Encrypted Hard Drive	Legal	File deletion
Employees that left the business: emergency contacts and bank account details	Delete immediately after making final salary payment	Encrypted Hard Drive	Legal	File deletion
Pay & tax: pay deductions, tax forms, payroll, loans	[6] years after last action	Encrypted Hard drive, Sage Online Platform	Legal	File deletion
Records of formal disciplinary actions in employee file	[6] years after last action	Encrypted hard drive	Legal	File deletion
Records of formal grievances in employee file	[6] years after last action	Encrypted hard drive	Legal	File deletion

### Commercial contracts:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contracts with	10 years after	Encrypted	Accounting	File

suppliers	last action	hard drive/Sage Online Platform	records	deletion
Contracts signed as a deed	[12] years after last action	Encrypted hard drive/Sage Online Platform	Legal/Accounting records	File deletion
Guarantees and indemnities	[i.e. state the term of the guarantee plus 6 years]	Encrypted hard drive/Sage Online Platform	Legal/accounting records	File deletion
Purchase orders and invoices	10 years after last action	Encrypted hard drive/Sage Online Platform	Legal/accounting records	File deletion

**Marketing records:**

<b>Type of record</b>	<b>Retention period</b>	<b>Where is it stored?</b>	<b>Reason</b>	<b>Method of deletion</b>
Mailing lists	1 year after last action	Encrypted hard drive/Sage Online Platform	To assist with accounting and lead generation.	File deletion



**Tax and Accounting Records:**

<b>Type of record</b>	<b>Retention period</b>	<b>Where is it stored?</b>	<b>Reason</b>	<b>Method of deletion</b>
Tax returns	15 years from end of fiscal year	Encrypted hard drive/Sage Online Platform	Audit	File deletion
Accounting & financial management information	15 years from end of fiscal year	Encrypted hard drive/Sage Online Platform	Audit	File deletion
Stock transfer forms and share certificates	20 years from purchase	Encrypted hard drive/Sage Online Platform	Audit	File deletion

**Operational records:**

<b>Type of record</b>	<b>Retention period</b>	<b>Where is it stored?</b>	<b>Reason</b>	<b>Method of deletion</b>
Vehicles	Keep asset and depreciation records for 6 years after end of financial year to which they relate.	Accountant's encrypted hard drive/Sage Online Platform	Legal	File deletion
Closed circuit television recordings	Destroy 4 weeks from the date recorded except where required as evidence	NA	NA	NA
Fire Risk Assessments	Retain until superseded	Encrypted hard drive	Legal	File deletion
Policies/Procedures	7 years	Encrypted Hard Drive	Legal	File deletion
Complaints	6 years from end of fiscal year	Encrypted hard drive	Legal	File deletion
Building (i.e. lease/deeds)	Destroy 6 years after property is no longer occupied	NA	NA	NA
Maintenance	15 years from	Encrypted hard	Legal	File

contracts	last action	drive/Sage online platform		deletion
Website FAQs	6 months from last action	Online web platform	Issue is generally resolved upon response	File deletion
Property plans and surveys	25 years	NA	NA	NA
Insurance schedules	10 years after last action	Encrypted hard drive	Legal	File deletion
Pat tests, fire hazard tests	6 years from last action	Encrypted hard drive	Legal	File deletion
Register of members	Life of company	Encrypted hard drive/Sage /HMRCOnline Platform	Legal	File deletion
Memorandum of association	Life of company	Encrypted hard drive/Sage Online Platform/HMRC	Legal	File deletion
Register of directors and secretaries	Life of company	Encrypted hard drive/Sage Online Platform/HMRC	Legal	File deletion
Employer's liability insurance certificates	Life of company	Encrypted hard drive/Sage Online Platform/HMRC	Legal	File deletion

## Who we share information with

Data processors

### **Sage UK Limited**

This data processor does the following activities for us: Online accounting platform provider

Other organisations

- Insurance companies
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Professional consultants
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media (where appropriate)

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated

8 May 2024