



# SENTENTIA

**General Data Protection Regulations (2018)**  
**Nova Visio Ltd, Sententia Business Services &**  
**Innovation Pathway Group**  
**Privacy Policy**

The General Data Protection Regulations (2018) sets out 6 key principles for the acquisition, retention and processing of personal data and Nova Visio Ltd (trading as) Sententia Business Services and Innovation Pathway Group undertakes to comply with those principles as set out in this Privacy Policy which explains what information we collect, how it is stored and how it is used.

Nova Visio Ltd, Sententia Business Services Ltd & Innovation Pathway Group operate in the Business to Business environment and only hold data that is either in the public domain or has been given with default implied or explicit consent to use, this most often is in the form of a business card exchange or in an electronic form such as receipt of an email that includes the information being held and we treat all this information as Personal Data.

Nova Visio (trading as) Sententia Business Services & Innovation Pathway Group act as the 'Controller' of the personal data you provide to us, this means we control what happens to the data in our possession. We need to know your basic personal data to provide you with information associated with your queries and our services. We will not collect any personal data from you that we do not need, to provide and manage this service to you.

No other third parties have access to your personal data unless it is specifically required to meet either contractual obligations or the legitimate interests of the company as defined under Article 5 of the General Data Protection Regulations, as set out in the 6 key principles and the stated purposes below.

By entering into a business relationship or exchanging your details in the context of a potential business relationship with either Nova Visio Ltd, Sententia Business Services or Innovation Pathway Group, you explicitly agree to the terms and conditions set out in this Privacy Policy.

Any person who wishes to be removed from our database should send an email to [admin@sententia-business.co.uk](mailto:admin@sententia-business.co.uk) with "Remove" in the subject header.

**Principle 1: Information must be processed lawfully, fairly and in a transparent manner in relation to individuals.**

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group only collect and hold the minimum information required about individuals or businesses and is usually limited to an individuals' name, business name, business address and contact details including email address, telephone number AND other forms of electronic identity such as a Skype name for the sole purpose of developing a business relationship.*

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group only hold information relating to bank accounts for the sole and explicit purpose of carrying out routine financial transactions in a business to business relationship.*

**Principle 2: Information is only collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.**

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group only process information where there is either a recognised, perceived or inherent business to business relationship between the parties, this is usually in the form of electronic or voice-based communications.*

**Principle 3: Information held will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.**

*Neither Nova Visio Ltd nor Sententia Business Services or Innovation Pathway Group will hold or process information for any purpose other than furthering mutually beneficial business relationships and are inherently limited to an individuals' name, their contact details and the business that they are associated with.*

**Principle 4: Information is to be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay.**

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group have received and will inherently receive information about individuals, primarily in the form of a business to business context and in the form of business cards or electronic communication. At the point of exchange, this information is assumed to be up to date and correct and will be stored and processed with that understanding. Over time, we recognise that individual circumstances may change and when we become aware of this, we will either correct or remove the individuals' details.*

**Principle 5: Information will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.**

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group only hold basic personal information in the context of business to business relationships and statutory record keeping. As the timeframe for a potential future business opportunity cannot be predicted, Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group will hold basic information for an unspecified but reasonable period of time but only process that information in a legitimate business to business and statutory record keeping context.*

*Where it becomes evident that personal details are no longer correct, i.e. a returned email “recipient not known at this address”, or we are notified by the individual, all details relating to that individual will be deleted or corrected at the first opportunity and ideally within 48 hours.*

*Any individual who requests that their details be removed from our systems will be removed from our systems at the first available opportunity and ideally within 48 hours of the request being received.*

**Principle 6: Information will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”**

*Neither Nova Visio Ltd, Sententia Business Services nor Innovation Pathway Group will sell to any third party or will purposefully release information about an individual unless explicit consent has been received or there is an established undertaking, with the exception of introductions to other individuals where the potential for a business relationship has been identified and the introduction is likely in the mutual interest of those individuals. The release of any such information will be likely limited to the minimal information required such as a name, an email address and a contact phone number.*

*On occasion and within a business to business environment, individuals may receive a personal invitation from a representative of Nova Visio Ltd or Sententia Business Services or Innovation Pathway Group to an event that is likely to be of interest to the individual or may have a communique forwarded onto them that is deemed to be of likely interest to the recipient individual, most likely business events.*

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group hold information about individuals and businesses on stand-alone (non-networked) computer systems which are protected by various security software. Systems running Windows 10 have encryption enabled.*

*Cloud services such as MS OneDrive, Dropbox, Google Drive, BT Cloud and Webmail are all made use of and are password protected for the storage and processing of information and which may contain basic personal information such as email addresses and embedded information such as electronic signatures and associated business information and have inherently been supplied by the individual in the form of an email or a information exchange in keeping with the legitimate interests of the business.*

*Computer systems and mobile technology including but not limited to SMART Phones, laptops, iPad’s etc that hold personal data are password protected and it is the sole responsibility of the “user” of that technology to ensure that suitably secure passwords or password management systems are used, that systems software is set to automatically update and that adequate protection of the physical asset is maintained.*

*The Sententia Website and associated business email systems are hosted by 1and1.co.uk who state that they are GDPR compliant. Their GDPR statement can be found here <https://www.1and1.co.uk/terms-gtc/terms-privacy/?linkId=nav.foot.account.privacy>*

*WiFi routers and internet access points within the control of Nova Visio, Sententia Business Services and Innovation Pathway Group are “hidden” from public access with password protection.*

*No manual records are created or stored with the exception of essential business transactions such as invoices, letters and payroll information which may contain an individuals’ name and other necessary personal information. These are stored in a secure environment with controlled access.*

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group will not knowingly sell, release or otherwise process individual information to or with third parties outside of the conditions set out within this Privacy Policy.*

*Nova Visio Ltd, Sententia Business Services & Innovation Pathway Group will only use individual information for marketing purposes where a defined reason and mutually beneficial opportunity has been identified and are within the legitimate interests of the business; this will most likely be in the form of very low-level, information-based activity and personal invitations.*

**Any individual who wishes that their personal information be removed from our systems or wishes to know what information we hold about the individual should send an email to: -**

- To **remove** your details from our systems, please send an email with “**Remove**” in the subject header at [admin@sententia-business.co.uk](mailto:admin@sententia-business.co.uk) with your name and email address and we will endeavour to remove your details within 48 hours.
- If you wish to know what information we hold about you (an individual) or correct a mistake, please send an email with “**Subject Access Request**” in the subject header to [Admin@sententia-business.co.uk](mailto:Admin@sententia-business.co.uk) with your name and email address and we will respond within 10 days.
- If we are not able to clearly identify your details, we will most likely request further information from you to ensure that the correct details are removed.

Nova Visio Ltd (trading as) Sententia Business Services and or Innovation Pathway Group is registered with the **Information Commissioners Office** registration reference **ZA206251**

**This GDPR statement will be reviewed and updated where necessary on an annual basis (1<sup>st</sup> January) unless otherwise required by law.**

**END**