

## PRIVACY NOTICE

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our customers, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former clients.

### A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

### B) TYPES OF DATA HELD

We keep several categories of personal data on our clients in order to carry out effective and efficient processes. We keep this data in a client file relating to each client and we also hold the data within our computer systems, for example, SMART our back office system.

Specifically, we hold the following types of data, as appropriate to your status:

- a) personal details such as name, address, phone numbers and email address
- b) CCTV footage
- c) building access card records
- d) IT equipment use including telephones and internet access.
- e) Site images used for internal use only

### C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the sales process and subsequently upon the start of your project.

Personal data is kept in files or within the Company's Back Office IT systems.

### D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the client contract we have with you.



The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
To communicate with our clients during the sales process and throughout client projects.	Our legitimate interests
Maintaining comprehensive up to date client records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact throughout the sales and project process.	Our legitimate interests
Ensuring efficient administration of quotes, invoices, and statements.	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Preventing fraud	Our legitimate interests
Communication with clients through newsletters.	Our legitimate interests
Processing of photographs for internal use regarding projects	Our legitimate interests
Processing of photographs for external use i.e. social media, promotions i.e. magazine adverts and brochures. Separate permission will be required.	Our legitimate interests

## E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to you:

- a) No special data stored on clients

## F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of works with you.

## G) CRIMINAL CONVICTION DATA

No criminal data stored.

## H) WHO WE SHARE YOUR DATA WITH

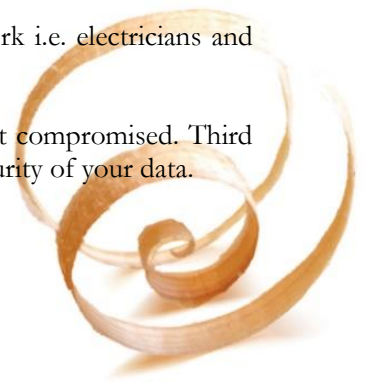
Employees within our company will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons: Promotional and contracts work i.e. electricians and plumbers etc.

We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

## I) PROTECTING YOUR DATA



We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## **J) RETENTION PERIODS**

We only keep your data for as long as we need it for. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data.

## **K) AUTOMATED DECISION MAKING**

No automated decision making is made in respect of clients.

## **L) CLIENT RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you.
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected.  
This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

## **M) CONSENT**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

## **N) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

## **O) DATA PROTECTION COMPLIANCE**

Our appointed compliance officer in respect of our data protection activities is:

\_\_\_\_\_Helen Thompson\_\_\_\_\_ (Name)  
\_\_\_\_\_helen@ptoy.co.uk\_\_\_\_\_ (Contact details).

