

Privacy and Data Protection Policy

CK Facilities Management Ltd (including the wholly owned subsidiary companies City + Kent Cleaning Ltd, CK Consumables Ltd and CK Group Services Ltd) are committed to the processing of personal data transparently, responsibly and in compliance with GDPR - the latest legislation surrounding data protection.

We will use details collected to fulfil the services provided to you, during the order process relating to the orders you place with us, and for direct marketing in the future. Our lawful basis for processing is based on services provided, product sales and direct marketing being legitimate interests, and in line with the legal obligations imposed upon us. We will ensure that there is minimal risk of harm or distress from our direct marketing by taking steps to put data subjects in an equivalent position to consent, and by making unsubscribing and managing user preferences simple and accessible. Marketing will only be related to previous purchases made with us. We do not use personal data for profiling and analysis purposes, and we do not use automated software to make decisions for the purposes of direct marketing. We are committed to only using the minimum amount of personal data necessary, and we have concluded that the data we collect is the minimum amount we require to fulfil services, orders and conduct direct marketing.

We have implemented robust security protocols for the storage of all personal data. We will not sell personal data to any company outside of CK Facilities Management Ltd or its wholly owned subsidiary companies City + Kent Cleaning Ltd, CK Consumables Ltd and CK Group Services Ltd.

We will conduct necessary due diligence with any third parties involved in the processing of personal data and only use established, reputable and compliant partners to the best of our reasonable knowledge. We will ensure that a data subjects fundamental rights and freedoms are respected and adhered to at all times

CK Facilities Management Ltd and Your Data

This privacy policy relates to that of CK Facilities Management Ltd and its wholly owned subsidiary companies City + Kent Cleaning Ltd, CK Consumables Ltd and CK Group Services Ltd, and all websites which are trading under it.

We value the trust of our customers and strive to respect your privacy when handling data relating to the use of our internal systems, websites and transactions performed on our websites. This policy describes how we collect personal data about you, the type of data we collect, how this data is used and how you, a valued customer, can control the use of your data that we hold.

WHAT DATA DO WE COLLECT?

In order to provide services, process orders and ensure the best possible levels of service, we collect certain personal and company information when you procure a service from us, or complete a transaction. This includes your:

- Title
- Name
- Email Address
- Telephone Number

- Company Name
- Site Address
- Delivery Address
- Banking details
- Payment Details (please note we do not retain this information as all transactions are done via a secure connection with an established payment provider)

HOW WE USE YOUR DATA

We will primarily use your data to:

- Keep you updated on the status of the works we undertake for you or the processing of your order
- Fulfil the delivery of the services provided to you or your order placed
- Contact you if there is a query regarding the services we provide to you, or any query relating to your order
- Verify your identity or undertake credit checks in relation to your company for services we provide, or orders placed via Purchase Order
- Assist with any customer queries

For orders placed, your data including payment address and payment details will be shared with our relevant and reputable third-party banking provider in order to verify and authorise your payment, and so your order can be processed. All third parties used to process payments are under strict obligation to ensure your personal information is kept private.

In the case of services provided to you, we will hold your banking details on our secure internal systems which are only accessible by our internal finance and compliance teams. Your data may be shared with our relevant and reputable credit check provider for credit check verification purpose. All third parties used to undertake credit check verification are under strict obligation to ensure your personal data is kept confidential.

COOKIES:

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work or work more efficiently, as well as to provide information to the owners of the site.

This website makes use of cookies to monitor visitor sessions. We may collect data about the internet browser that you use, and which pages you visit and interact with. We do this, so we can ensure you have the best user experience and can be presented with more relevant content, such as products you have previously viewed.

Information stored in the cookie that is issued by our website is not linked to any other personal information you may give us during your visit. If you do not wish to receive these cookies you can easily and safely disable them in your browser, though doing so may affect the functionality of our website. We do not share cookie data with advertising and analytical providers for the purposes of conducting online analysis.

DIRECT MARKETING

We operate on an opt-out basis as we rely on 'legitimate interests' as a lawful basis for processing personal data.

We will process your personal data for the purposes of direct marketing of similar products or services from within CK Facilities Management Ltd and its wholly owned subsidiary companies in the future, unless you take the opportunity to opt out of direct marketing upon completion of your first order with us, or you unsubscribe at any point. We do however acknowledge that we deal with some private individuals, and that individual employees of companies who input personal data whilst dealing with us have the right to be informed and the right to object to direct marketing. We have therefore put in place a number of controls to put our customers in an equivalent position of control to consent, and to minimise the potential for harm or distress that any unwanted direct marketing could cause. We have concluded these steps to be reasonable and effective in balancing our interest of direct marketing with customer's rights and expectations under GDPR. More information on our justification for direct marketing is available on request.

PROFILING

We do undertake profiling of our customers to improve our direct marketing efforts.

WHAT YOU MAY RECEIVE

The privacy of your personal data is of the highest importance to us. We will not share or sell your personal details to any company outside of CK Facilities Management Ltd or its wholly owned subsidiary companies for the purposes of sending direct marketing. Unless you have requested not to receive promotional material from CK Facilities Management Ltd or any of its wholly owned subsidiary companies, we may use your personal information to provide you with other relevant offers and details of promotions relating to your transaction history. We may contact you in a number of ways using the personal data supplied when placing an order with us which includes via:

- Email
- Post
- Telephone

You may also receive postal marketing from us. You can unsubscribe from this by emailing our Compliance team at: admin@ckgroupservices.com. "NO MAIL" as the email subject.

DELIVERY & BILLING ADDRESS

We understand that many organisations may purchase from a central office and have their order delivered to a different address, such as an individual branch or office. We accept that a different address entered within the delivery section of the order being placed on the website, as that being the main delivery address for the purpose of the order placed. We will use billing address details for the purposes of direct marketing under legitimate interests as in this case. You can choose to opt out of marketing by contacting us via email, post or telephone.

DATA RETENTION & SECURITY

All customer personal data is stored on secure servers employing extensive security measures to ensure it remains fully protected at all times. All servers used for data storage are also physically secured and provided by reputable companies that meet the highest

standards of security. We do not store any payment card information on any of our own servers.

GENERAL RETENTION PERIODS

CK Facilities Management Ltd and its wholly owned subsidiary companies will only retain customer data for as long as is reasonable and necessary. However, we do acknowledge that private individuals purchase from us, and under GDPR we have an obligation to ensure that data is kept up to date and accurate. We take this seriously and therefore, have several controls in place to ensure that data can be amended easily, and that we take steps to ensure out of date data is not used for direct marketing. More information on retention periods and the steps we have taken to keep data up to date is available on request.

DURING THE RETENTION PERIOD

CK Facilities Management Ltd and its wholly owned subsidiary companies may use retained customer data for the purposes of on-going services, sales and direct marketing. The data we collect and use:

- Title
- Name
- Company's Name
- Site Address
- Delivery Address
- Payment Address (please note we do not retain this information as all transactions are done via a secure connection with an established payment provider)
- Email Address
- Telephone Number

We will store the details securely and back them up daily to secure cloud-based servers.

Customers may unsubscribe from any marketing communication at any time. Their data will still be stored on the system and on secure servers. They will be flagged as "NOT TO BE MARKETED TO" on our database.

Out of date data will be kept on our system but will be suppressed from future marketing efforts. This will be flagged as "OUT OF DATE" on our database.

We will not sell or rent data outside of CK Facilities Management Ltd or its wholly owned subsidiary companies regardless of how long data has been retained for.

We will not collect more personal data than the bare minimum for the purposes of services, sales and direct marketing. Nor will we retain irrelevant information. We have concluded that the data we collect is the minimum amount we require in order to complete the services required, orders placed and to conduct direct marketing.

MANAGING YOUR PERSONAL DATA AND HOW IT IS PROCESSED

As a valued customer and in line with GDPR, you have full control over your data and how it is used by CK Facilities Management Ltd and its wholly owned subsidiary companies City + Kent Cleaning Ltd, CK Consumables Ltd and CK Group Services Ltd. We offer a number of ways our customers can manage their personal data in order to ensure that our interests do not override fundamental rights and freedoms or fall outside of a data subject's expectations.

YOUR RIGHT TO OBJECT AND YOUR RIGHT TO RESTRICT PROCESSING:

We have no desire to send marketing material that is intrusive or not of interest to you, and you have an absolute right to object and opt-out of all direct marketing as per the following means:

To remove your data from email marketing:

Email admin@ckgroupservices.com with "NO ESHOTS" as the email subject

To remove your data from Postal marketing:

Email admin@ckgroupservices.com with "NO MAIL" as the email subject

To remove your data from Telephone marketing:

Email admin@ckgroupservices.com with "NO PHONE" as the email subject

To remove your data from All marketing activity:

Email admin@ckgroupservices.com with "REMOVE" as the email subject.

All of the above can also be managed by calling our Compliance team on 020 8659 6748.

UPDATING YOUR DETAILS – YOUR RIGHT TO RECTIFICATION

Should any of the information you have provided to us change, or require amending, please let us know the correct details by sending an email stating "Change Details" as the email subject, to our Compliance team at: admin@ckgroupservices.com

Or

By sending a letter to our Compliance team at CK Facilities Management Limited, 22 Metro Centre, Kangley Bridge Road, Sydenham, London SE26 5BW.

Or

By phoning our Compliance team on 020 8659 6748 and stating the details you would like to rectify

Or

Log in to the 'My Account' section on the website to manage your personal details

You also have the right to object to us processing your personal data for a particular purpose or purposes, and any request for us to cease the processing of your data should be sent in writing along with the reason you wish processing to cease, to our Compliance team at: CK Facilities Management Ltd, 22 Metro Centre, Kangley Bridge Road, Sydenham, London SE26 5BW.

SUBJECT ACCESS REQUESTS – YOUR RIGHT TO ACCESS

We respect an individual's right to access any personal data that we hold on them. As such we have an internal process in place to handle subject access requests expediently and in accordance with GDPR requirements.

CK Facilities Management Ltd and its wholly owned subsidiary companies will:

Provide a copy of the information free of charge. However, we will charge a reasonable fee based on administrative costs when a request is manifestly unfounded, excessive, or repetitive.

Provide a response within one month of receipt.

Take reasonable steps to verify the identity of the person making the request.

Provide the information in a commonly used electronic format.

DELETION OF PERSONAL DATA – YOUR RIGHT TO ERASURE

We will not keep your personal data for any longer than is necessary, and we respect an individual's right to the deletion of any personal data that we hold for them.

We will delete all personal data upon written request from the data subject. We will only retain personal data if we are involved in legal proceedings or complying with legal obligations or a court order, or upon the instruction of a Government authority.

THIRD PARTIES WE MAY SHARE YOUR DATA WITH TO FULFIL AN ORDER:

Direct Delivery Suppliers: Some products we sell may be shipped directly from a supplier to the customer. Where this is the case, we will need to pass on delivery names and addresses to fulfil the order. We will have processes and documentation in place with our direct delivery suppliers which will demonstrate our due diligence in checking that they will handle and dispose of any personal data in accordance with GDPR. We will also have strict agreements in place with regards to the processing of personal data.

Credit reference agencies: Where we offer instant credit, we reserve the right to use personal details inputted during the order process in the interests of fraud prevention and to ascertain credit worthiness. These will always be reputable companies and be subject to strict agreements in place with regards to personal data (further details are available on

request). Credit referencing typically only involves company information and is not personally identifiable, as we only extend credit options to established UK businesses.

Payment gateways: Your data including payment address and payment details will be shared with our relevant and reputable third-party banking provider in order to verify and authorise your payment, and so your order can be processed. The third-party used to process payments is under strict obligation to ensure your personal information is kept private.

Couriers: We sometimes despatch orders via a number of established couriers, this involves passing name and address details used for delivery in order to fulfil the order.

Insurers: Your data including name, company name, business address, site address, delivery address, telephone number and email address may be shared with our insurers for any claim which is made relating the services we have provided, and the loss of any product supplied by us which may be lost or damaged in transit.

DATA BREACHES

CK Facilities Management Ltd and its wholly owned subsidiary companies have a breach reporting procedure in place and in the unlikely event of a breach, will act as per requirements under GDPR.

CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time-to-time by posting an updated version on our website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by email.

SALE OF BUSINESS

In the event that our business is sold, or integrated with another business, your details may be passed on to our advisers and any prospected purchaser's adviser and will also be passed on to the new owners of the business.

HOW DO YOU GET IN TOUCH WITH US?

General Data Protection Queries

If you have any queries about the way in which we process your personal data. You can get in touch with our Compliance team by emailing them at: admin@ckgroupservices.com