Privacy Policy

Welcome to Alexander James Home Renovations privacy information.

Alexander James Home Renovations Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data whenever that information is provided to us. This includes when you, or your business, request information from us, contact us (or we contact you), apply to set up an account with us, purchase goods or services from us, use our website(s)/apps, [connect with us via social media], link to or from our website(s)/apps, or any other engagement we have with you (regardless of where you are based). It also tells you about your privacy rights and how the law protects you.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how **Alexander James Home Renovations Ltd** collects and processes your personal data in our dealings with you, including in providing goods and services to you, and including any data you may provide through this our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Alexander James Home Renovations Ltd is the controller of your personal data and responsible for our website. **Alexander James Home Renovations Ltd** is based at 7 Willowhale Avenue, Bognor Regis, PO21 4AU.

Alexander James Home Renovations Ltd. has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The Data Protection Officer

Alexander James Home Renovations Ltd 7 Willowhale Avenue Bognor Regis. PO21 4AU 01243 941971 info@ajhee.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This privacy notice was published on 1st February 2019.

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

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ? Identity Data includes first name, last name, username or similar identifier, title.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes payment card details and, where you or your business have or apply for a credit account with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website/or any apps.
- **Usage Data** includes information as to how you use our website.
- **Marketing and Communications Data** includes your preferences as to whether you are happy to receive marketing from us and, if so, your communication preferences.

In the normal course, we will not collect **Special Categories of Personal Data** about you. [Criminal offences may, however, appear on credit references or anti-fraud checks we may make].

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a contract you have with us, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you which include through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, via this website, apps or on social media, or otherwise. This

includes personal data you provide when you or your business

- 1. subscribe to our newsletter and/or other publications;
- 2. request a brochure or other promotional or marketing materials to be sent to you/your business;
- 3. purchase goods [and/or services] via our website;
- 4. enter a competition, or respond to a promotion or survey;
- 5. give us some feedback.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ? Where we need to perform the contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ? Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message;

You have the right to withdraw consent at any time by emailing <u>info@ajhee.co.uk</u> with your account number.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to an enquiry from you.	(a) Identity(b) Contact	Necessary to take steps at your request prior to entering into a contract with you.
To provide goods and/or services to you, and to collect and recover money owned to us	(a) Identity(b) Contact(c) Financial(d) Transaction	Performance of a contract with you Necessary for our legitimate interests (to operate our business and recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback	 (a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage 	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our services) [Your consent (email/SMS marketing)]

To use data analytics to improve our website, services, marketing and customer relationships	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To deal with issues, complaints or disputes arising out of our relationship with you/your business, and to prevent or detect crime, including fraud	 (a) Identity (b) Financial (c) Technical (d) Profile (e) Usage 	To establish, exercise or defend legal claims

When we refer to legitimate interests, we mean the interest of our business in conducting and managing our business to enable us to give you the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). We do not undertake automated decision making using your personal data.

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.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of parties set out below for the purposes set out in the table in paragraph 4 above.

External third parties, including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our services and website;
- **?** professional advisers, including lawyers, banks, auditors and insurers;
- HM Revenue and Customs, regulators and other authorities;
- entities involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management and dispute resolution.

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. In addition, we limit access to your personal data to those employees processing data.

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.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

OR

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- ? Request access to your personal data
- ? Request correction of your personal data
- ? Request erasure of your personal data
- ? Object to processing of your personal data
- ? Request restriction of processing your personal data
- ? Request transfer of your personal data
- **?** *Right to withdraw consent*

If you wish to exercise any of the rights set out above, please email info@ajhee.co.uk

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 fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 enable us to deal with your request or to speed up our response.

We will 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 we have received several requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which

will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data. Where we are relying on our legitimate interest (or that of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **?** Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9. MONITORING

We may monitor and/or record:

(a) telephone calls;

(b) transactions [and activities at all points of contact];

(c) web, traffic and activities

These are to ensure that we carry out your instructions accurately, for training purposes and to improve our services, and to ensure security and prevent fraud.

Alexander James Homes Renovations Ltd - Privacy notice

1 February

2019