

Unit 1 Swanwick Business Centre, Bridge Rd, Swanwick, Southampton, SO31 7GB Tel: 023 8073 7714 – Email: <u>info@classicfire.co.uk</u>

Privacy Policy

Purpose of policy

We are committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of our clients and in turn to provide you with relevant and timely information about the work we do both on and off site. The purpose of this policy is to give a clear explanation about how we collect and use information collected from you directly and from third parties. We use your information in accordance with all applicable laws concerning the protection of personal information (which includes, from 25th May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) and all related data protection legislation having effect in the United Kingdom from time to time) and are responsible as 'controller' of that personal information for the purpose of those laws ('Data Protection Laws').

This policy explains

- What information we may collect about you;
- How we may use that information;
- In what situations we may disclose your details to third parties;
- Information about how we keep your personal information secure, how we maintain it for and your rights to be able to access it

If you have any queries about this policy, please contact our Data Protection Officer Tim Redman at the address above or via email <u>tim@classicfire.co.uk</u>

Who are we?

Classicfire & Security Ltd is based in Southampton and specializes in the service and supply of all types of fire extinguishers, fire blankets, alarms, safety signs, risk assessment and onsite training. With over 35 years of experience in the fire protection industry, Classicfire offers the highest quality service and attention to detail with no tie in contracts. We are a 'one-stop-shop' for all your firefighting equipment requirements. We are a registered company in England & Wales under registration number 5819011.

Information collection

We collect various types of information and in a number of ways:

• Information you give us

Customers: For example when you contact us via our website, we'll store personal information you give us such as your name, email address, postal address and telephone number. We will also store records of your purchases with us. Other third parties: We also collect personal data from contractors, suppliers and any other third party engaging in our work.

• Information about your interactions with us

for example, when you visit our website, we collect information about how you interact with our content and ads. In the case of emails we keep a record of which ones you have opened and which links you have clicked on. This assists us to better tailor our communications to you and create an enhanced customer journey for you.

• Information from third parties we occasionally receive information about you from third parties. For example, we may use third party research companies to provide general information about you, compiled using publicly available data.

• Sensitive personal data

The Data Protection Laws recognize that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not collect this type of information about our clients and other third parties unless there is a clear reason for doing so.

Keeping your personal information safe and secure is our top priority. The fact that the law is changing only builds on what we already do today. That is to give your personal information the respect and security it deserves.

Legal basis

There are three bases under which we may process your data.

• Contract purposes

when you make a purchase from us or use our services you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of problems with our services or your orders and in the case of problems with payment.

• Legitimate organizational interests

in certain situations we collect and process your personal data for purposes that are in our legitimate organizational interests. However we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may us this basis for processing.

• With your explicit consent

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

Marketing communications

We aim to communicate with you about the work we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as any preferences you may have told us about. We use legitimate organizational interest as the legal basis for the communications by post, telephone and email. Before contacting individuals by telephone we will always check the telephone preference service.

In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy.

In the case of email we will give you the option to opt out of receiving them the first time you create an account with us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

Other processing activities

In addition to marketing communications, we also process personal information in the following ways that are within or legitimate organizational interests:

- To allow us to improve our services;
- We may analyze data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible. We may analyze data we hold about you in order to identify and prevent fraud;
- In order to improve our website we may analyze information about how you use it and the content and ads you interact with;

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out our tasks above that are for your benefit.

Third Parties

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows.

- To our own service providers who process data on our behalf and on our instructions (for example email marketing and other IT software or support providers). In these cases we require that these third parties comply strictly with our instructions and with Data Protection Laws, for example around security of personal data.
- Where we are under a duty to disclose your personal information in order to comply with any regulatory or legal obligation (for example to government bodies and law enforcement agencies).
- We may share anonymized, pseudonymised and non-personal information with subcontractors.

To the best of our knowledge, understanding and belief your personal information will not otherwise be transferred outside of the EEA or to any country not approved by the European Commission.

Website links

Our website, may from time to time, contain links to and from partners', advertisers', affiliates' and social network sites. If you follow a link to any of these websites, please note that these sites have their own privacy policies and we do not accept responsibility or liability for those policies. Please check those privacy policies before you submit your personal data to those websites as they may not be the same terms as ours.

Maintaining your personal information

Personal data is generally stored for 7-years, no data is kept longer than is reasonably necessary and always subject to the principle of data minimization.

For any subsequent purchases you make we are able to link them back to a single unique record that we hold for you on our system. If there are aspects of your record that are inaccurate or that you would like to remove, then please use the contact details at the end of this policy. Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

Security of your personal information

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will do so only in an authorized manor and are subject to a duty of confidentiality.

We will always store your digital information on secure servers. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we our best to protect your information, we cannot guarantee the security of your information transmitted to our website or other wise to our servers. Details supplied via our 'contact us' form are secured with SSL (Secure Socket Layer) which is technology used for establishing an encrypted link between a server and a browser. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your rights to your personal information

Under the Data Protection Laws, you have a number of important rights free of charge. In summary those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and any to certain other supplementary information that this Privacy Policy is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning to certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object to certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of these rights, including circumstances in which they apply, see the Guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to Tim Redman, our Data Protection Officer;
- let us have enough information to identify you;
- let us know the information to which your request relates.

If you would like to unsubscribe from any marketing emails you can also click on the 'unsubscribe' button at the bottom of the email.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The Data Protection Laws also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

Changes to this policy

This Privacy Policy was last updated on 22 May 2018.

We may change this Privacy Policy from time to time and any material changes we make in the future will be uploaded to our website. Please check back frequently to see any updates or changes to this Privacy Policy.

How to contact us

Please contact our Data Protection Officer if you have any questions about this Privacy Policy or the information we hold about you. If you wish to contact our Data Protection Officer, please send an email to <u>tim@classicfire.co.uk</u> telephone: 02380 737714 or write to the address below.

Data Protection Officer Classicfire & Security Ltd Unit 1 Swanwick Business Centre Bridge Rd Southampton SO31 7GB.