

H.D WINDOWS LIMITED

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

This is a statement of policy in accordance with the General Data Protection Regulation 2016 (GDPR) adopted by H.D. Windows Limited.

A director is responsibility for the updating and dissemination of the policy and conducting regular reviews to reflect changes in legislation or the company's controls and procedures to ensure effectiveness.

All staff are expected to apply the policy and to seek advice when required.

Policy objectives

- To endorse and adhere to the principles of data protection in accordance with the General Data Protection Regulation 2016 (GDPR)
- To protect the rights and freedom of individuals and to ensure that personal data is not processed without their knowledge or consent
- Applies to the processing of personal data wholly or partly by automated or other means essential to the commercial activities of the company
- Applies to all data subjects resident in the EU
- Applies to any personal information relating to an individual able to identify that person, including special categories of personal data as determined by GDPR

Privacy Notice (Fair data processing notice)

H.D. Windows needs to access and process information and data relating to customers, suppliers, employees, contractors and other Third Parties with whom the company conducts business.

We regard the lawful and correct treatment of information as important to the achievement of our objectives, the integrity of our business and to ensure confidence between our customers, suppliers, employees, contractors and ourselves. We therefore ensure that our organisation treats information lawfully and correctly.

All data retained by the company will be retained in secure, legible and readily retrievable condition. Electronic data will be backed up on a regular basis with back up records either retained in secure cloud storage or in hard drive format off site.

Legal basis for processing

Information shall be obtained and processed only for specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose.

In addition, the company may be required by law to collect and use certain types of information to comply with central and local government requirements.

This information will be processed in accordance with our legal obligation and in accordance with GDPR.

Categories of personal data

- Personal details (Name, Title)
- Postal and, or billing address
- E-mail address
- Telephone numbers – both landline and mobile
- Bank details
- Transaction history information (customers and suppliers only)
- Customer complaints and feedback.
- Verbatim quotations (telephone conversations and messages)
- Identification numbers (employees only - Staff / payroll number)
- PAYE and National Insurance details (employees only)
- Correspondence
- Website details (customers, suppliers, contractors and other Third Parties only)
- Marketing and promotional literature (customers, suppliers, contractors and other Third Parties only)
- Intellectual property (customers only)

Sources of personal data

All personal data obtained by H.D. Windows will be sourced directly from the data subject, with the exception of information received from credit check service providers or data that is provided to the company by central and local government agencies.

Whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us. It is not the policy of H.D Windows to purchase data from third parties such as marketing analytics companies or database providers.

Data sharing and recipients

Information and data supplied to H.D. Windows by either its customers, suppliers, employees or contractors will not be disclosed to other parties without the written consent of the provider, with the exception of specialist service providers that may be necessary for the performance of a contract, or to achieve compliance with a legal obligation including:

- IT Support
- Cloud storage
- Payment service providers / processors
- Delivery / courier services
- Specialist subcontractors
- Credit check providers
- Legal services
- Accountancy services
- Central and local government
- HR service providers

Data retention periods

Information will be retained in a secure environment and not be retained for longer than is necessary for the specified purpose. All data obtained for the performance of a contract, or to achieve compliance with a legal obligation, shall be retained for one year after the completion of the contract, or conclusion of the legal process, unless a longer retention period is required to comply with contractual or legal obligation.

Contract data shall be retained for defined periods to enable the company to fulfil any guarantee, warranty or dispute resolution situations that may arise following the conclusion of the contract.

Data subjects' rights

All information shall be processed in accordance with the rights of data subjects under GDPR. Data subjects have the following rights regarding the personal data that the company processes and retains about them:

- The right to be informed
- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to automated decision making including profiling

In order to satisfy our responsibilities in ensuring security of our data subjects personal data, technical and organisational measures will be implemented to prevent the unauthorised or unlawful processing of data, accidental loss, corruption, destruction, or damage to data.

Should you wish to exercise any of the above rights regarding the data that we hold about you contact us in writing at:

Dawn Cousins
H.D. Windows Limited
Unit 1 Manor Farm
Upper Stondon
Henlow
Hertfordshire
SG16 6LJ

Complaints

If you wish to make a complaint about the personal data that we are processing and retaining about you, please contact us at the above address in the first instance.

If you are not satisfied by our response you may lodge a complaint with the Information Commissioners Office (ICO).

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 1231113 (Local rate)
01625 545745 (National rate)

Signed on behalf of H.D. Windows Limited:


Neil Brown
Managing Director

31/5/18
Date