

# PRIVACY POLICY

## Privacy Policy

This privacy policy was last updated on 25th of May 2018 in line with GDPR requirements.

We take your privacy very seriously and are committed to protecting your personal data at all times.

The purpose of this Privacy Policy is to set out how we use and look after your personal data when you visit our website and other digital platforms. We'll also tell you about your privacy rights and how the data protection law protects you.

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## 1. ABOUT US AND THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect, use, share, store, process and protect your personal data through your use of this website, including any data you may provide through the website when you sign up for our newsletter, submit a contact form or make a purchase.

This website is not intended for children and we do not knowingly collect data relating to children. Where we become aware that a child has provided us with personal data, we will take steps to remove the data.

You should read this privacy policy together with any other privacy policy 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.

### How to contact us about your personal data or this privacy policy

If you have any questions about this privacy policy or about the personal data we hold about you, please email [contact@easyp plumber.co.uk](mailto:contact@easyp plumber.co.uk) with the subject line 'Data Privacy at Easy Plumber'.

The Data Controller for all personal data collected via this website is Easy Plumber Ltd. As the Data Controller, we are responsible for deciding what data we collect and how we hold and use your personal data. We will implement appropriate data security measures for protecting the data from unauthorised access and loss, as laid out in the Data Security section of this policy

### Third-party links outside of our control

This 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. WHAT INFORMATION WE COLLECT

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

All personal information that we collect will be recorded, used and protected by us in accordance with the applicable data protection legislation and this privacy policy. We may supplement the information that you provide with other information that we obtain from our dealings with you.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including First Name, Surname, IP address, Business Name, Job Title
- **Contact Data** including Billing Address, Email Address, Telephone number
- **Financial Data** including Bank Name, Account Number and Sort Code for billing purposes

We also collect and use aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data (see 'How we use your data' below) but is not considered personal data in law as this data

does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature or page. However, if we combine or connect aggregated data with your personal data so

that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We do not carry out automated decision making or any type of automated profiling and we never sell, rent or lease your Personal Data to a third party.

### If you fail to provide personal data

Where we need to collect your 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 product or service you have with us but we will notify you if this is the case at the time.

If you don't consent to receive our promotional emails we will be unable to keep you informed of up-coming workshops, special offers, training/coaching opportunities and other products or services that we think may be of interest to you.

## 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data when you visit our website, make an enquiry or communicate with us. We use both direct (information you provide) and indirect (information we collect) methods to collect data from and about you:

- **Directly.** You may give us your Identity, Contact and Financial data through emails, phone calls, online forms, face to face meetings or otherwise. This includes personal data you provide when you:

- Submit a contact form from our website

If you choose to contact us via the 'Contact us' form on our website, we will collect your personal information. We will collect your name, email address and any comment that you choose to leave. Once the form is submitted, we will use the details you supplied to email you back. Your personal information will not be added to our mailing list.

- **Indirectly.** We may indirectly collect personal information about you, when you visit our site, through cookies and other technologies (see below for details). This allows us to improve our service as well as understand trends in order to enhance and customise content and ads.

### Cookies

Like many other website operators we use 'cookies' and other tracking technologies such as 'pixels' and 'beacons' on our website to improve the customer experience, deliver content tailored to your interests and serve relevant online targeted advertising, as well as learn more about how you interact with the site.

Cookies are small data files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use

and navigation of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or

[www.allaboutcookies.org](http://www.allaboutcookies.org). 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.

### Google Analytics

In common with many other websites when you visit our website we use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this not to identify you personally but to analyse your use of our website in order to deliver relevant website content

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and advertisements to you and to understand the effectiveness of our marketing and advertising activities.

By visiting our website we may have access to your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

This data may be processed for the purposes of analysing the use of our website and our services. The legal basis for this processing is Legitimate Interest, namely monitoring and improving our website and services.

We do not collect personal data about individuals except where there is a legitimate business interest (see below) or when such information is provided voluntarily via consent, or by entering into a contract with us or where required to do so by law.

#### 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:

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to, such as HMRC or ABPI.
- **Consent** generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending our regular email newsletter and follow-up emails about goods and services that we think you might be interested in. You have the right to withdraw consent to marketing at any time by contacting us.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

#### Non-Personal Data

We may also use your non-personal data for measuring traffic patterns on our website, understanding demographics, customer interest and trends, providing, improving and modifying the services we provide and for promotional and marketing purposes.

#### Marketing emails

The lawful basis for processing your personal data to send you marketing emails is either Legitimate Interest or consent. We use your personal data to send you regular emails about topics relating to the subject matter of this website, as well as company news, information about upcoming training opportunities and other products and services of ours and partner companies which we think may be of interest to you. We also gather behaviour data around open-rates, click through rates etc, to help us monitor and improve our email marketing.

We never rent, sell or trade email lists with other organisations and businesses. If you have consented to receive marketing, you may opt out at any time by clicking the Unsubscribe link at the bottom of any of our emails or by writing to us at the address

above. If you opt-out of receiving our marketing emails, you may still receive transactional emails necessary for the delivery of a product or service.

#### Social media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively. Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to

contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question.

Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account. **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted

out of receiving that marketing.

#### Opting out

If you do not wish to receive marketing messages from us, you may opt out at any time. Every marketing e-mail will include an 'unsubscribe' link at the bottom. You may also notify us in writing as set out above.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing a product or service or other transaction.

#### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 5. WHO WE SHARE YOUR PERSONAL DATA WITH

In common with many businesses, we may share your personal data with a number of third party companies and service providers, in order to help us administer our business effectively.

External third parties include:

- Providers (acting as processors), United Kingdom who provide IT and system administration services

Professional advisers (acting as processors or joint controllers) including lawyers, bankers and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom and who require the reporting of processing activities in certain circumstances.

Examples of the 3rd party software processors we use include:

- Scott Noble Digital Services, acting as freelance Website Manager
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 6. INTERNATIONAL TRANSFERS

Our website is hosted by Wix, but we do not store any personal data on the website or their servers.

Some of our external third parties are based outside the European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by implementing safeguards:

- We will only transfer your personal data to countries that the European

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Commission have approved as providing an adequate level of protection for personal data.

- We use US-based providers that are part of EU-US Privacy Shield or Swiss- US agreements, as they are deemed to have equivalent safeguards in place.
- We will only use established and reputable companies that can demonstrate a commitment to upholding the high standards of data protection that GDPR sets
- We will review the publicly available data protection policies to ensure adequate data protection measures are in place.

To learn more about the Privacy Shield agreement, visit

<https://www.privacyshield.gov> Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

We take the security of your personal information seriously. 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, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

This website uses industry standard Secure Sockets Layer (SSL) encryption technology to safeguard your information.

## 8. DATA RETENTION

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.

- If you opted in to our mailing list, as per the marketing emails section above, your data will be stored until such time as you unsubscribe.
- Clients' details will be retained for 7 years for contractual purposes and to maintain tax records. Basic details (name, address, telephone numbers, email address) may be retained for a minimum of 7 years after completion of a contract.
- By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.
- We store information gathered from phone and email enquiries for up to 12 months
- We store information gathered from our contact form for up to 12 months
- We store information gathered in the course of dealing with customers for up to 7 years

In some circumstances you can ask us to delete your data: see **Your legal rights** 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. We continuously review the data we hold and delete what is no longer required.

## 9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is

based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us at the address mentioned above.

## No fee required – with some exceptions

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

## What we may need from you

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 speed up our response.

## Time limit to respond

We 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 you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We aim to adhere to the highest standards of data privacy and so our policies and procedures are constantly being reviewed and updated where necessary. It is therefore recommended that you check this page periodically to review the latest version.

In order for us to maintain these high standards it is important that the personal data we hold about you is accurate and current, therefore please inform us if your personal data changes during your relationship with us.

## 11. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, in the first instance please contact our us. If

this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031 231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.