



RTM Plumbing and Heating - GDPR Privacy Statement

INTRODUCTION

RTM Plumbing and Heating respects privacy and is strongly committed to protecting personal data.

This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights to access or change their personal data. This statement applies to personal data provided to us, both by individuals themselves, or by others. We may use personal data provided to us for any of the purposes described in this privacy statement, or as otherwise stated at the point of collection.

ABOUT US

RTM Plumbing and Heating is a Partnership, whose registered office is The Workshop, Main Street Bankfoot, PH1 4AB. We can be contacted at the above address, addressing any request to our Data Compliance Officer. We can also be contacted at the following email address: info@rtmplumbingandheating.co.uk

HOW WE COLLECT PERSONAL DATA

Personal data is any information relating to an identified or identifiable living person. RTM Plumbing and Heating processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, it is our policy to be transparent about why and how we process this.

RTM Plumbing and Heating, collects personal data about existing and potential customers and/or individuals associated with them directly where contact is made with us in person, by telephone, email, at meetings, through our website, via CCTV operating on our premises or by any other method.

The collection of personal data will include:

Contact Data:

Name, postal address, employer name, contact, title, phone number, emergency contact details, email address and other business contact details. In addition, data may be collected from email (sender name, recipient name, date and time) and calendar (organiser name, participant name, date and time of event) concerning interactions between RTM Plumbing and Heating and contacts or third parties.

Identity Data:

Date of birth, photographic identity, passport number, other identity evidence as required to meet our regulatory obligations.

**Special Category Data:**

Special category data is defined as data relating to race, ethnic origin, politics, religion, trade union membership, genetic, biometric, sex life and sexual orientation.

This information is not routinely collected but may be required for certain types of Human Resources activities (equal opportunities monitoring and reporting; health and medical information may be used for the purpose of providing advice regarding employee absence management).

Criminal history data:

This type of personal data may be processed in relation to our recruitment processes.

Personal information contained in correspondence:

Copies of letters and/or emails received or sent by the Company and information provided by customers in letters, emails and texts may be collected. We may also keep notes of matters we discuss or advise upon.

Payment details:

In order to pay and transmit monies in the course of supplier transactions or collection of our own costs and charges from customers.

Recruitment information including special category data:

CVs and covering letters;

Completed application forms which may include contact details, career history, qualifications and skills;

Information communicated in job interviews or through recruitment processes;

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about race, religious beliefs, sexual orientation and political opinions to ensure meaningful equal opportunities monitoring and reporting;
- Information about disability status to consider whether we need to provide appropriate adjustments during the recruitment process;
- Information about criminal convictions providing a basic disclosure of criminal records through our recruitment process.

Visitors to our premises

We have security measures in place on our premises, including CCTV. There are signs around our premises showing that CCTV is in operation. The images and audio captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident).

CCTV recordings are typically automatically overwritten after a short period of time (5 days) unless an issue is identified that requires investigation.

We require visitors to sign in at the office, and we keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need to know basis (e.g. to look into an incident).



Visitors to our website

Visitors to our website are generally in control of the personal data shared with us. We may capture limited personal data automatically via the use of cookies on our website.

We receive personal data such as name, title, company address, email address and telephone numbers from website visitors.

Visitors are also able to send an email to us through our website. Their messages will contain the user's screen name and email address, as well as any additional information the user may wish to include in the message.

We ask that individuals do not provide sensitive information (such as race or ethnic origin, political opinions, religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website; if individuals choose to provide sensitive information to us for any reason, the act of doing so constitutes their explicit consent for us to collect and use that information in the ways described in this privacy statement or as described at the point where individuals chose to disclose this information.

HOW WE USE PERSONAL DATA

We will use personal information for the purposes listed below on the basis of:

- Consent (where we request it);
- Where we need to comply with our legal obligations or meet legal obligations on behalf of a customer;
- Performance of a Contract;
- Our legitimate interests, or the legitimate interests of our customers.

Personal data relating to business contacts may be visible to, and used by RTM Plumbing and Heating users to learn more about a customer, project or issue they have an interest in, and may also be used for the following purposes:

- **Customer Marketing**; we may use personal data to send information about our products that we feel may be of interest or benefit to individuals. The lawful basis of processing will be consent, and our legitimate interests, or the legitimate interests of our customers;
- **Communicating** with customers regarding their instructions, questions and concerns. The lawful basis of processing will be the performance of a contract and our legitimate interests;
- **Debt recovery**; we may provide personal data to, and receive personal information from third parties where necessary to recover debts due to us. The lawful basis of processing will be our legitimate interests;
- **IT and Security**; we may use personal data to administer and protect our business and website. The lawful basis of processing will be our legitimate interests;
- **Administering**, managing and developing our business. The lawful basis of processing will be performance of a contract and our legitimate interests;
- **Providing information** about us and our products. The lawful basis of processing will be our legitimate interests and the legitimate interests of our customers;
- **Making contact** information available to RTM Plumbing and Heating users. The lawful basis of processing will be our legitimate interests;
- **Describing the nature** of a contact's relationship with RTM Plumbing and Heating. The lawful basis of processing will be our legitimate interests and the legitimate interests of our customers.



DATA STORAGE

We take appropriate technical and organisational measures to secure personal data and protect it against unlawful processing as well as against its accidental loss, destruction or damage.

These measures include:

- Using a secure server to store personal data;
- Verifying the identity of users who access personal data;
- Regularly reviewing our information security management system;
- Utilising anti-virus and anti-malware systems at the gateway, and on email to protect personal data;
- Personal data will be stored in private protected files and restricted to those who need to know the information in order to deliver their responsibilities;
- Paper documentation will be stored in secure filing systems, which will be locked at all times;
- Training will be provided to all appropriate RTM Plumbing and Heating users.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect personal information, we cannot guarantee the security of personal information transmitted.

SHARING PERSONAL DATA

Where we engage third parties to process data on our behalf, we will keep this to a minimum, and ensure, via a data processing agreement with the third party, that the third party takes such reasonable measures to ensure that recipients only process the disclosed personal data for those purposes in accordance with our instructions.

We will not transfer personal data to anyone else without permission, except:

- Where we are obliged to by law or regulatory obligations;
- Where we are required to share information with any external third parties who provide services to, or for us;

We will never sell information or disclose it for direct marketing purposes.

We do not allow third-party service providers to use personal data for their own purposes.

We do not transfer any personal data outside the European Economic Area (EEA) unless we receive specific consent from the individual to do so.

DATA RETENTION

We do not hold personal data for longer than is necessary. We have a retention policy which sets out the periods and rules for retaining and reviewing all data that we hold. Personal data will be retained for as long as is necessary for the purposes set out above.

DATA DISPOSAL

Personal data will be disposed of via permanent deletion from our telephone, IT system and email, and through shredding and securing disposal of paper documents.



INDIVIDUAL'S RIGHTS UNDER DATA PROTECTION LAWS

Individuals have a number of rights under data protection law:

The right to be informed

Individuals must be provided with information including our purposes for processing their personal data; our retention periods for that personal data, and who it will be shared with. This information is contained in the above privacy statement.

The right to access

Individuals have the right to request access to the personal data held on them by making a subject access request. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month. We will normally comply with requests at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may request a fee. This fee must be paid in order for us to comply with the request. The fee will be determined at the relevant time and will be set at a level which is reasonable in the circumstances. In addition, we may also charge a reasonable fee if further requests are made for copies of the same information.

The right to rectification

Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month. In certain circumstances we may refuse a request for rectification where it interferes with our obligations under the accuracy principle of GDPR.

The right of erasure

Individuals have the right to have personal data erased. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month. This right is not absolute and only applies in certain circumstances.

The right to restrict processing

Individuals have the right to request restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When the right to restrict is granted, we are permitted to store the personal data, but not to use it. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month.

The right to data portability

Individuals have the right to obtain and reuse their personal data for their own purposes across different services. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month. We will provide information in a way that is accessible and machine-readable. We can also transfer data to another organisation upon the individual's request.

The right to object

Individuals have the right to object to the processing of their personal data. Individuals should make a request in writing to the Data Compliance Officer; we will respond within one calendar month. If we agree to an objection, we will stop using the data for that purpose, unless we can give strong and legitimate reasons to continue using the data despite an individual's objections.

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We may update this Privacy Statement from time to time. The update will be held on our website. We will not process personal data for purposes other than those set out in this Privacy Statement.