

## **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS**

### **Introduction**

Fulcher Edwards Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our [terms of website use policy](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

Fulcher Edwards Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Unit 2D Horseshoe Business Park, Upper Lye Lane, Bricket Wood, St. Albans, Herts AL2 3TA. For all data matters contact Claire Fulcher-Powell on 01923 616985 or email [info@fulcheredwards.co.uk](mailto:info@fulcheredwards.co.uk)

### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To manage our employees
- To maintain our own accounts and records
- To inform individuals of attendance, when maintenance is due and news
- You may give us information about you by filling in forms on our site [www.fulcheredwards.co.uk](http://www.fulcheredwards.co.uk) (our site) or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, request a quotation, instruct works, subscribe to our service, participate in social media functions on our site and when you report a problem with our site
- You may contact us via our website using a Jotform template which asks for your details for the purpose of answering your enquiry.
- our website uses Google Analytics to gather statistical information like how many people visit our website, how long they stay on our web pages. This information may include IP addresses used but, does not include any other personal data.

### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data when you instruct our services:

- your name;
- your home or work address, email address and/or phone number;
- your job title;
- your payment details, including billing address and credit card details, where you pay our invoices;
- information related to the browser or device you use to access our website;
- internet browser and operating system;

### 5. What is our legal basis for processing your personal data?

#### a) Personal data (article 6 of GDPR)

#### Our lawful basis for processing your general personal data:

Consent of the data subject;	An email will be sent asking for consent to send email reminders about when maintenance is due and to update you on Company service information.
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	If you enter into an agreement with us to provide or receive our service we require information in order to enter into a contract with you or are unable to do so without it. This may include communicating with you, taking payments, providing customer services and arranging dates for works to be carried out.

## **6. Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with Fulcher Edwards employees in order to provide you with the services you require from us and to maintain our own accounts and records. We will not share your personal data with any third parties unless it is required for the purpose of the works you have instructed us to do. For example, subcontractors and wholesalers who may be attending your property to carry out works or deliver materials required for the works. Only details that are necessary to fulfill the works will be given.

## **7. How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data

- To provide a client with an ongoing maintenance service as instructed until client cancels contract.
- To notify client when maintenance is due in order for them to comply with current British Standards and decide if they would like us to instruct us to carry out the maintenance required.
- Accounts information such as invoices, credit notes and remittance advice notification are kept for 7 years.
- Copies of certification issued to client will be kept for up to 6 years.
- Emails and quotation will be kept on file until works are either complete or contract of services is cancelled by client or we have not heard from client for a period of time. Quotations are kept for 12 months and then deleted if we have not been instructed within that time frame.

## **8. Providing us with your personal data**

We require your personal data as it is a requirement necessary to enter into a contract to carry our works instructed which includes providing a quotation.

## **9. Your rights and your personal data**

Unless subject to an exemption under the GDPR, 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 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 the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the 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 the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **10. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **11. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **12. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact us at Fulcher Edwards Ltd, Unit 2D Horseshoe Business Park, Upper Lye Lane, Bricket Wood, Herts AL2 3TA.

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 03031231113 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, England.