

## GDPR POLICY

Change Glazing and Lock Limited is committed to being transparent about how it handles personal information. We recognise that it is important to protect the privacy and security of your information in compliance with the General Data Protection Regulation (GDPR) and The Data Protection Act 2018. The purpose of this policy is make you aware of how and why we collect your information. In order to operate competently, Change Glazing and Locks Limited has to collect information about Clients, employees and associates.

### Data Protection Principles

Under the GDPR there are six key principles that Change Glazing and Lock Limited must comply with. These state that any personal information we hold must:

- Be processed lawfully, fairly and in a transparent manner.
- Used only for the specific and explicit purpose it was collected for.
- Adequate, relevant and limited to what is necessary in relation to those purposes.
- Accurate and up to date.
- Kept no longer than necessary.
- Handle and manage information securely to protect it from, accidental, loss, destruction and damage.

Change Glazing and Locks Limited are responsible for demonstrating and fulfilling these key principles.

### What types of personal information do we collect about you?

The GDPR provides Change Glazing and Locks Limited with conditions for processing and storing information. There are two types of information that can be collected. These are personal information and sensitive personal information. Personal information is any information about an individual from which a person can be identified from. Sensitive personal information consists of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Change Glazing and Locks Limited collects personal information about customers so that we provide the best service possible. These include:

- Contact details, including name, address, telephone number and e-mail address (if provided)
- the start date of work and completion date
- information regarding warranties and guarantees

Change Glazing and Locks Limited collects, uses and processes a range of personal information about our employees. This includes:

- contact details, including your name, address, telephone number and personal e-mail address
- emergency contact details/next of kin
- date of birth
- gender
- marital status and dependants

- the start and end dates of employment or engagement
- recruitment records, including personal information included in a CV, any application form, cover letter, interview notes, references, copies of proof of right to work in the UK documentation, copies of qualification certificates, copy of driving licence and other background check documentation
- the terms and conditions of employment or engagement (including job title and working hours), as set out in a job offer letter, employment contract, written statement of employment particulars, casual worker agreement, consultancy agreement, pay review and bonus letters, statements of changes to employment or engagement terms and related correspondence
- details of skills, qualifications, experience and work history, both with previous employers and with the Company
- professional memberships
- salary, entitlement to benefits and pension information
- National Insurance number
- bank account details, payroll records, tax code and tax status information
- any disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warning letters, performance improvement plans and related correspondence
- appraisals, including appraisal forms, performance reviews and ratings, targets and objectives set
- training records
- timesheets
- annual leave and other leave records, including details of the types of and reasons for leave being taken and related correspondence
- any termination of employment or engagement documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and related correspondence
- information about the use of our IT systems, including usage of telephones, e-mail and the Internet
- photographs.

**Under the GDPR, individuals have:**

- **The right to access**

This means that individuals have the right to request access to their personal data and to ask how their data is used by the company after it has been gathered. The company must provide a copy of the personal data, free of charge and in electronic format if requested.

- **The right to be forgotten**

If consumers are no longer customers, or if they withdraw their consent from a company to use their personal data, then they have the right to have their data deleted.

- **The right to be informed**

This covers any gathering of data by companies, and individuals must be informed before data is gathered. Consumers have to opt in for their data to be gathered, and consent must be freely given rather than implied.

- **The right to have information corrected**

This ensures that individuals can have their data updated if it is out of date or incomplete or incorrect.

- **The right to restrict processing**

Individuals can request that their data is not used for processing. Their record can remain in place, but not be used.

- **The right to object**

This includes the right of individuals to stop the processing of their data for direct marketing. There are no exemptions to this rule, and any processing must stop as soon as the request is received. In addition, this right must be made clear to individuals at the very start of any communication.

- **The right to be notified**

If there has been a data breach which compromises an individual's personal data, the individual has a right to be informed within 72 hours of first having become aware of the breach.

#### **How do we collect your personal information?**

Change Glazing and Locks limited collect customer information when we are contacted directly, via telephone, email, social media (Facebook) or through our websites enquiry page ([www.change-gl.co.uk](http://www.change-gl.co.uk)).

We may collect your personal information for the following purposes:

- **Access and use of our website**

When entering our website or using our online enquiry form, we will record information necessary to provide you with access for the operation of our website to comply with legal requirements.

- **Responding to your enquiry and request for information**

When you contact us (online or offline) with a request for information about a product or service, we will collect the necessary information to fulfil the request so that we can provide you with the correct support and be able to contact you. For example, we will collect your name and contact information, details about your enquiry/ request, quotations and invoicing and client feedback information. We hold this information for administrative purposes, product guarantees and to maintain our relationship with you.

- **Contacting tenants of our clients and suppliers**

In association with our clients or suppliers, they may also provide us with any contact information that is needed to fulfil our services (such as names, addresses or telephone number) for purposes such as our services, quotation, invoicing, delivery and product guarantee.

As a company we collect information about our employees from our recruitment process, either directly from themselves or via an employment agency.

## **Storing Personal Information**

We store your personal information in connection with an enquiry, quotation, invoicing and product guarantee to provide you with the services requested, we do this because it is essential for the agreement made with you. We will not keep hold of any personal information longer than necessary to fulfil the purposes for which it is intended. Under the GDPR you have the right to request access, change or update your personal information at any time. Any information is stored via our Customer Relationship Management (CRM) system, through a third party (bigchangeapps).

## **Sharing of Personal Information**

At Change Glazing and Locks Limited, we would like to make you aware that in certain circumstances personal information may be released to government organisations or Change Glazing and Locks Limited legal representatives should we need to recover costs or we feel the local law is being broken. We may also share your personal information to protect the rights of our employees, clients and suppliers.

## **Change of purpose**

We will only use your personal information for the purpose for which we have collected it. If we need to use your personal information for other purposes, we will notify you and provide you with any information needed.

## **Who has access to your personal information?**

Your personal information may be shared internally within Change Glazing and Locks Limited. This includes technicians/ engineers, office administrators and managers. We use a third-party IT service platform (bigchangeapps) who store your personal information. For our employees we have external HR support (solutions for HR).

## **How does Change Glazing and Locks limited protect your personal information?**

We have put security measures in place to protect your personal information. All computers are password protected, any paperwork (such as quotes or invoices) are kept locked away in the office. These are destroyed when no longer needed. In addition, we limit access to your personal information to our employees and other third parties (e.g. IT service platform or suppliers) who have a business need to know in order to perform their job duties and responsibilities. When your personal information is shared with third- party providers, we require them to take technical and organisational security to protect your personal information and to treat it confidentially. We only allow them to process your information for specified purposes and we do not allow them to use them for their purposes. At Change Glazing and Locks Limited if we have a suspected data security breach we will inform the Information Commissioners Office (ICO) within 72 hours. We will work alongside our third-party service platform (bigchangeapps) to prevent this from happening.

## **How long does Change Glazing and Locks Limited keep your personal information?**

We will only retain your information for as long as necessary to fulfil the purposes for which it is intended (e.g. some of our products come with a 10-year insurance backed guarantee, so we will hold your information of this length of time).

### **Changes to this GDPR Policy**

Change Glazing and Locks Limited reserve the right to update and change this policy at any time.

### **Contact**

If you have any questions about this policy or how we handle your personal information please contact us on: 03333 208 567.