

Privacy Notice

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all services, for customers and employees.

This privacy notice applies to personal information processed by or on behalf of Vectacom Ltd

1, Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices.

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our services, if relevant, includes:

- · Personal and contact details, such as title, full name, contact details and contact details history
- · Your date of birth, gender and/or age if relevant
- Your nationality, if relevant
- · Family members, if relevant
- · Records of your contact with us such as via the phone, email, details such as your phone number, email address
- · Services you have used, as well as have been interested in and have held and the associated payment methods used.
- · Criminal records information, including alleged offences if relevant
- Information about your health or if you are a vulnerable customer
- Information about your property, such as location, property type, building work that is required or completed and cosmetic repairs required.
- Your residency and/or citizenship status, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK
- Your marital status, family, lifestyle or social circumstances, if relevant.
- Tax information, if relevant (for example, HMRC).

3. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from associates of services
- Information generated about you when you use our services.
- · From companies who we work with to provide services or quote to you
- From other sources such as HMRC if relevant

4. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 2 above, for the following purposes:

- Updating your records
- · Managing any aspect of the service we offer
- To perform our services and internal processes
- · To improve the operation of our business and that of our business partners
- · To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff.
- To provide personalised services to you, such as tailoring our services.
- To develop new services and to review and improve current services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers for ourselves either as part of providing services, helping us improve services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners as part of providing and administering our services or operating our business

5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

· Where it is needed to provide you with our services, such as:

a) Updating your records.

b) All stages and activities relevant to managing the service including enquiry, application, administration and management of accounts.

• Where it is in our legitimate interests to do so, such as:

a) Managing your services relating to that, updating your records, and doing this for recovering any debt (where appropriate)

- b) To perform and/or test the performance of our services and internal processes
- c) To follow guidance and recommended best practice of government and regulatory bodies
- d) For management and audit of our business operations including accounting

e) To keep records of our communications with you and our staff

f) Subject to the appropriate controls, to provide insight and analysis of our customers either as part of providing services, helping us improve services, or to assess or to improve the operating of our businesses

g) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

- To comply with our legal obligation
- With your consent or explicit consent:

a) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer.

5. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Others who are a part of providing your services or operating our business
- Governmental and regulatory bodies such as HMRC. HSE if relevant
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers and Head Office staff.

7. How and when can you withdraw your consent?

Where we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

8. Is your personal information transferred outside the UK?

We are based in the UK, no data is transferred outside of the UK

11. What should you do if your personal information changes?

You should tell us so that we can update our records. We'll then update your records if we can.

12. Do you have to provide your personal information to us?

We're unable to provide you with our services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

13. Do we do any monitoring involving processing of your personal information?

Monitoring means any: listening to, recording of, viewing of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications. We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules. This information may be shared for the purposes described above.

14. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- · For as long as we provide services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

15. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- · The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information
 completed

- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <u>https://ico.org.uk/</u>. You can contact us using the details below.

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights, you can contact us at:

http://www.vectacom.org.uk

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