

## Version 1.0

Updated: 18<sup>th</sup> November 2019

Maintaining your privacy and your trust is very important. We strive to be especially clear on how we use your personal information if and when we collect it, and on the ways in which we can work together to protect your privacy.

This document is for compliance with the Data Protection & Privacy legislation.

This Privacy Policy explains the:

- Identity and contact information of the data controller
- Legitimate interests of the data controller or third party (if applicable)
- Purpose of the processing and the lawful basis for the processing
- Categories of personal data to be processed
- Details of whether personal data came from direct or indirect sources
- Recipients or categories of recipients of the personal data
- Details of data transfers to a third country and safeguards
- Length of time personal data is processed and any criteria used to establish the length of time the data is processed
- Data Subject's Rights (Your rights)
- Right to complain to the supervisory authority/regulator
- Details of any part of a statutory or contractual requirement and possible consequences of failing to provide the personal data
- The existence of any automated decision making, including profiling and information about how decisions are made

### What products and services are covered by this policy?

This Privacy Policy applies to the information that we may obtain from you through your use of our website(s) or personally, collectively called the "Services". If you have any questions or need more information about these Services, please contact us at the email address in the section below.

### Data Controller

For the purposes of the data protection & privacy legislation the Data Controller is:

Keep It Cool Refrigeration Ltd. ("I", "we," "us," "our")  
Legal Status: Limited Company, 05378084  
Unit 4 & 5,  
Ashlaur Court,  
Clovelly Road Industrial Estate,  
Bideford

North Devon  
EX39 3HN

Email:

[sales@keepitcoolsouthwest.co.uk](mailto:sales@keepitcoolsouthwest.co.uk)

### **Data Protection (Charges and Information) Regulations 2018**

We are registered with the supervisory authority under registration reference:  
ZA253518

#### **Purpose and legitimate interest. How do we use the information we collect?**

We may use the information we collect for a variety of purposes, including to:

- provide you with the services or information that you have asked for;
- keep a record of your relationship with us
- send you correspondence and communicate with you in relation to our services;
- meet our legal obligations;
- protect your vital interests;
- respond to or fulfil any requests, complaints or queries that you may have;
- understand how we can improve our services or information;
- generate reports on our work and service; and
- safeguard our staff, customers, suppliers, visitors and contractors.

#### **Lawful Basis of Processing:**

##### **General Personal Data:**

1. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
2. Processing is necessary for compliance with a legal obligation to which the controller is subject.
3. Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
4. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
5. The data subject has given consent to the processing of his or her personal data for one or more specific purposes. Consent may be withdrawn at any time.

## Special Category Personal Data

1. the data subject has given explicit consent to the processing of those personal data for one or more specified purposes;
2. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
3. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
4. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
5. Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3.

## Categories of personal data and Sources

### What information do we collect from you, and how is it used?

#### Direct:

You can visit our website without telling us who you are and without revealing any personal information about yourself. To provide full service however and if contacting us directly by other means, we will most often need to collect some personal information. For instance, we collect information about you when you complete and online form, register for an account and when you create or modify your personal data for one of our Services. The types of Information we collect may include:

| Purposes of processing              | Categories of individuals | Categories of personal data |
|-------------------------------------|---------------------------|-----------------------------|
| Staff administration                | Employees                 | Contact details             |
|                                     |                           | Financial details           |
|                                     |                           | Health details              |
|                                     | Emergency contacts        | Contact details             |
| Sales and Purchase Order processing | Customers                 | Contact details             |
|                                     |                           | Financial details           |

|          |           |                                    |
|----------|-----------|------------------------------------|
|          | Suppliers | Contact details                    |
|          |           | Financial details                  |
| Visitors | Visitors  | Contact details                    |
|          |           | Vehicle details                    |
|          |           | Health, Safety & Security details* |

*\*\* only processed in in case of accident, or incident requiring investigation.*

### **Children:**

We do not facilitate processing personal data of data subjects under the age of consent (children (13)), unless processed by our CCTV system.

### **CCTV**

1. We operate CCTV and other surveillance systems in (and around) our premises which capture images of you. We may be able to identify you from the CCTV data. We will only use this data to prevent, detect, deter and report on crime, to protect buildings and assets from crime, to protect the health and safety of customers, staff and other visitors and/or to assist with criminal investigations and support law enforcement, or other authorised bodies.
2. We use CCTV systems in this way for our legitimate interests (to prevent and detect crime), to comply with legal or regulatory obligations (to law enforcement bodies) and/or to protect the vital interests of you or another individual.

### **Indirect:**

**From CCTV:** see above.

**From cookies:** We may also collect “cookie” information that we may save to your computer or electronic device. If you do not accept cookies, you may not be able to use all functionality of our on-line Services.

For specific information on cookies, please read our **cookie policy**.

**Logs:** We may record certain information and store it in log files when you interact with our Services. This information may include Internet protocol (IP) or other device addresses or ID numbers as well as browser type, Internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, your mobile carrier, and system configuration information.

**Analytics:** We and our analytics providers also collect and store analytics

information when you use our Services to help us improve our Services. We make sure this data is anonymous by not connecting any analytics data to personally identifiable data such as a name, email address, physical address, or phone number.

**Social Media:** We operate social media business pages such as Facebook for Business. While acting as operator of these pages with those third-parties we only process aggregated data which cannot directly identify you. Therefore, if exercising your right to access your personal information in this regard as the data subject, and to allow these third parties time to reply within the legislative time-frame, you should click the link(s) in the data processor information section below.

**Public sources:**

Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.

**Recruitment services:**

We may obtain personal data about candidates from an employment agency, and other parties including former employers, and credit reference agencies.

**How might we share information?**

We are not in the business of selling your personal information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your personal information with third party data processors, as set forth below:

**With your consent:** We will not share your personal information with companies, organisations, or individuals who are not associated with us unless we have your affirmative consent to do so.

**Payment Processing:** We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use billing information except for the sole purpose of credit card processing.

**Newsletter Service:** We use a commercial application to facilitate our newsletter service.

**Where we are required to do so under statutory obligation:** HMRC, Accountants and other professional service organisations

**Compliance with Laws and Law Enforcement Requests; Protection of Our Rights:** We may disclose your information (including your personal information) to a third party if:

- We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request

- To protect the security or integrity of our products and services
- To protect our property, rights, and safety and that of our customers or the public from harm or illegal activities
- To respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person; or
- To investigate and defend ourselves against any third-party claims or allegations.

### **Business Transfers:**

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We will notify you of such a change in ownership or transfer of assets by posting a notice on our website.

### **Data Transfers**

The data controller does not transfer personal data outside of the United Kingdom or European Union, unless indicated below.

All data processors acting on behalf of the data controller have appropriate safeguards in place. For example, those operating in the USA, are signed up to the EU-US Privacy Shield.

### **Data Processor Information**

The following third-party service providers are used by us and only process data in accordance with the instructions from the data controller:

| Organisation             | Link to Privacy Policy or Agreement                          | Purpose of Processing  | Country |
|--------------------------|--|------------------------|---------|
| Gingerweb Ltd            | <a href="http://www.gingerweb.co.uk">www.gingerweb.co.uk</a> |                        |         |
| Facebook Ireland Limited |  | Facebook Business Page | Ireland |
|                          |  |                        |         |
|                          |  |                        |         |

### **How long will we keep the personal data?**

Retaining some data may be subject to a statutory retention period and this must be adhered to, (to keep certain data for a minimum period of time). This may include personal data (name, address, contact details), but on expiry of such statutory requirement, such data will be destroyed securely. Where possible any personally identifiable data will be anonymised or pseudonymised.

For the purposes of our CCTV system, personal data is stored for a period of **XX** days, unless requested to store for a longer period by public bodies, such as law enforcement agencies; or where the footage may be required in other evidential

circumstances at the request of the data subject.

*Your information we use for marketing purposes will be kept with us until you notify us that you no longer wish to receive this information. Our backup routine keeps data for a rolling 30-day period after which time the data is removed from all systems.*

### **Statutory or other requirements**

The data controller does not process personal data in respect of any statutory requirement, nor require personal data to be supplied as part of any contractual agreement, however in respect of the controller's services, certain communications may not be possible without such personal data being supplied, for example an email to furnish with updates information etc. or an address to fulfil an order.

### **Profiling and Automated Decision Making**

No profiling or automatic decision-making processes are undertaken by the data controller in respect of any personal data processing activities.

### **Your rights**

Your fundamental rights as a Data Subject are:

1. The right to be informed
2. The right of access
3. The right of rectification
4. The right of erasure (often known as the right to be forgotten)
5. The right to prevent processing
6. The right to data portability
7. The right to object
8. Rights in relation to automatic decision making and profiling

Under the right of access (2), you have the right to have:

- confirmation that your data is being processed;
- access to your personal data; and
- other supplementary information

So that you are aware of and can verify the lawfulness of the processing.

Your right to access can be exercised by contacting the data controller as above.

Not all fundamental rights are absolute.

## **Your right to complain to the supervisory authority/regulator**

You have the right to complain about organisations processing your personal data. You can exercise this right by contacting the supervisory authority of the data controller as follows:

### **Head office**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number