

# GENERAL PRIVACY NOTICE

Topcoat Property Services (we/us/our) – General Privacy Notice

## **BACKGROUND:**

Topcoat Property Services understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our clients and website visitors and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## **1. INFORMATION ABOUT US AND HOW TO CONTACT US**

Company name: Topcoat Property Services

Business type: Limited Company

Main trading address: 17 Juno Way, Rochester, Kent ME3 8FD

VAT number: NA

Data Protection Officer: Jason Mitchell

Email address: Enquiries@topcoatpropertyservices.co.uk

Telephone number: 07738 115 594

Postal Address: As Above

## **2. WHAT DOES THIS NOTICE COVER?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## **3. WHAT IS PERSONAL DATA?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### **4. WHAT ARE MY RIGHTS?**

Under GDPR regulations, you have the following rights, which we will always uphold:

- 1.The right to be informed about us collecting and the use of your personal data. This Privacy Notice should tell you everything you need to know, but you can contact us to find out more or ask a question using the details in part 1 above.
- 2.The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- 3.The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 1 to find out more.
- 4.The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that is stored by us. Please contact us using the details in Part 1 to find out more.
- 5.The right to restrict (i.e. prevent) the processing of your personal data.
- 6.The right to object to us using your personal data for a particular purpose or purposes.
- 7.The right to data portability. This means that, if you have provided personal data to us directly, The we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- 8.Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and profiling.

For more information about the use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 1.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about the use of your personal data by us, you have the right to lodge a complaint with the Information Commissioner's Office.

## **5. WHAT PERSONAL DATA DO YOU COLLECT?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests;
- Other sales performance related information

Your personal data is obtained from the following parties:

- You or your company
- Other sources as directed by you or your company
- Publicly published profiles on social media platforms

## **6. HOW DO YOU USE MY PERSONAL DATA?**

Under the GDPR regulations, we must always have a lawful basis for using personal data. This may be because the data is necessary for my performance of a contract with you, because you have consented to my use of your personal data, or because it is in my legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you, which may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by Enquiries@topcoatpropertyservices.co.uk and including the word 'Unsubscribe' in the subject field – or by using the preferences tab, in our electronic communicate's).

We may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers about my products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with my obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of decision-making and/or profiling. If at any point you wish to query any action that I take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), then GDPR gives you the right to do so. Please contact me to find out more using the details in Part 1.

The following automated decision-making methods may be used:

- CRM platform (such as, but not limited to HubSpot or Salesforce) which includes data described in Part 5, with the intended result of keeping more accurate records.
- Email marketing (such as, but not limited to Mail Chimp) platform which includes data described in Part 5 – with the intended result of communicating relevant products and/or services provided by us.
- Survey tools (such as, but not limited to SurveyMonkey or Google Forms) which includes data described in Part 5 – with the intended result of gaining client feedback about the products and/or services provided by us.

The following automated profiling may take place:

- The platforms and tools listed above that may be part of an automated decision-making method, which includes the data listed in Part 5 – with the intended result of evaluating a client's specific needs.
- Social media platforms (LinkedIn, Facebook and Twitter) which includes the data listed in Part 5 – with the intended result of evaluating a client's specific needs.

## **7. HOW LONG WILL YOU KEEP MY PERSONAL DATA?**

We will not keep your personal data for any longer than is necessary but only for the reasons for which it was first collected. Your personal data will, therefore, be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal data (including payment details) may be retained for the purposes of repeat orders or returning clients. This data will be reviewed after seven years and deleted if the client has made no repeat order or is no longer trading.
- Personal data may be retained if a request is received from a person or company to stop processing their personal data for direct marketing. It is appropriate for us to retain enough information about that person or company – for us to exclude them from future direct marketing activities. This data will be reviewed after seven years (to prevent inadvertent future marketing activities) and deleted if the client is no longer trading.
- Personal data may be retained for statistical or research purposes and this data would be used to help us adapt my products and/or services to future market trends. Personal data held for these purposes may be kept indefinitely as long as it is not used in connection with decisions affecting particular individuals, or in a way that is likely to cause damage or distress. This information will be reviewed after seven years and deleted when it is no longer needed for my statistical or research purposes.

## **8. HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?**

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

- The CRM platform provider we use, details of which can be requested using the contact details in part 1, which has updated and implemented practices that are GDPR-compliant.
- The marketing platform provider we use, details of which can be requested using the contact details in part 1, who has updated its Data Processing Agreement and third-party vendor contracts to meet the GDPR's requirements.
- The survey platform provider we use, details of which can be requested using the contact details in part 1. Which has introduced changes to their customer-facing legal terms (e.g. terms of use, privacy policy and statements, data processing agreement) to enable them and their customers to comply with GDPR requirements.
- The Social Media platforms we are active on, details of which can be requested using the contact details in part 1, who each have updated its products and services in compliance with the GDPR and updated its customer agreement to reflect GDPR requirements.

## **9. DO YOU SHARE MY PERSONAL DATA?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, the obligations of us, and the third party's obligations under the law, as described above in Part 8.

We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

## **10. HOW CAN I ACCESS MY PERSONAL DATA?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 1. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding. I will respond to your subject access request promptly and in any event within 40 calendar days of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **11. CHANGES TO THIS PRIVACY NOTICE**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change my business in a way that affects personal data protection.

Any changes will be made available by contacting us on the information given in Part 1.