

Data Privacy Notice

Issue	Date	Details of Amendment
V1	17/05/18	First publication

1. Introduction

Severn Valley Window & Door Ltd ("Severn Valley ", "we" or "us") holds personal data on its clients, and their employees, to provide its services. This Client Data Privacy Notice details the personal data Severn Valley may retain, process and share with third parties relating to your business and its employees. Severn Valley is committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Notice sets out the personal information that we collect and process as a data processor, the purposes of the processing and the rights connected with it. Severn Valley are also considered a Data Controller for some personal data, including data we store in relation to the creation and access of user accounts, administration, the methods of processing and service access.

If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact the Group Data Protection Officer.

2. Types of personal information we collect

During your engagement with Severn Valley, or during negotiations with Severn Valley, we may process information about you, your employees and other individuals whose personal information has been provided to us. The data we process will depend on the services we provide your company.

The types of personal information we may process include:

- Contact details – business address, mobile and telephone numbers, email addresses and web addresses
- Employment details – such as job title/position and office location
- Generally, we try not to collect or process any Sensitive Personal Data relating to clients and their employees, unless authorised by law or where necessary to comply with applicable laws.

3. Purposes for processing personal information

We have policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed without authorisation and only accessed or used for specific legal purposes.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact Severn Valley's Data Protection Officer.

4. Who we share personal information with

We take care to allow access to personal information only to those who require such access to perform their tasks and duties in relation to the provision of our services, and to third parties who have a legitimate purpose for accessing it to support these purposes. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the security and confidentiality of the information is maintained.

5. Data retention periods

Personal information will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained until the termination of our relationship with Severn Valley, plus a reasonable period of time thereafter to respond to work-related inquiries.

6. Data privacy rights

The following rights are available under applicable data protection law:

- **Access, correct, update or request deletion** of personal information
- **Object to processing** of personal information, ask us to **restrict processing** of personal information or **request portability** of personal information.

If we have collected and process personal information using a person's consent, then this can be **withdrawn** at any time. Withdrawing consent will not affect the lawfulness of any processing we conducted prior to withdrawal, nor will it affect processing of personal information conducted in reliance on lawful processing grounds other than consent.

You have the **right to complain to a data protection authority** about our collection and use of personal information. For more information, please contact your local data protection authority. In 5 April 2018 the United Kingdom, the data protection authority is the Information Commissioner's Office whose website is <https://ico.org.uk/>

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Please note, our ability to facilitate aspects of any of the above rights will depend on whether we are a Data Processor or a Data Controller in relation to any specific data. Any requests received relating to data processed on behalf of clients should be referred to the Data Controller.

7. Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices.

8. Contact details

Please address any questions or requests relating to this Notice to the Severn Valley Data Protection Officer at sales@Severnvalleywindows.co.uk or write to:

Data Protection Officer
Severn Valley Window & Door Ltd
Units 8-9 off faraday Drive
Bridgnorth
Shropshire
WV15 5BA

9. Key third-party processors

The following are Severn Valley 's key third-party processors in relation to client data.

Midland Computers Ltd are a business to business IT support company, providing Severn Valley with offsite secure data storage to ensure business continuity. Their facilities offer:

- All customer Data is stored within their access-controlled data centre
- Only specific staff members that are required to gain entry in to this area have access.
- All access events are electronically logged
- Business continuity backup drives are encrypted at point of backup and transported with their Engineering staff back to the data centre for storage.
- The encryption keys are stored within a locally hosted, digital and encrypted password store, again with only those members of staff that require access to the data having logins to the password store
- The data centre is protected against local blackouts by a Generator with UPS backup during the transition and stabilisation of generator provided power.
- The data centre is climate controlled and has a raised floor

10. Additional third-party processors

Data may be shared with several third-party processors to meet legal requirements, where Severn Valley outsources aspects of its processes or when providing specific services relating to maintaining our services. These companies may include, but are not limited to, the following:

- Sage (Accounting)
- HMRC
- Interface NRM Ltd (ISO9001 & ISO14001)
- Survey Monkey (Client Satisfaction Surveys)