

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

DATA PROTECTION OFFICER

As a small business, with fewer than 250 employees and, under GDPR, we:

- are not public authority or body (except for courts acting in their judicial capacity);
- do not carry out core activities that require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); or
- do not carry out activities that consist of large scale processing of special categories of data or data relating to criminal convictions and offences.

Therefore, we do not need to appoint a Data Protection Officer.

DATA INFORMATION

We only hold data information that has been shared with us by other organisations. This information is kept by us and is rarely shared with a third-party. If information is shared with a third party, this is only related to ongoing work activities (such as a client address or contact information) as a necessity to each job (for example, if we have a sub-contractor carrying out repair works, we will give them the client address and contact number). We do not carry or hold 'sensitive' data.

Some examples of personal data we hold will be information such as:

- Client name
- Client work telephone number (mobile and/or landline)
- Client work address

Some examples of personal 'sensitive' data that we DO NOT hold:

- Persons age,
- Sexual orientation
- Racial profile

The information we hold is kept in a CRM application, which is a third-party application where all the data is held on our premises. No data is shared with the third-party application software company.

DATA REMOVAL & INDIVIDUAL'S RIGHTS

We are happy to remove any data we hold when requested to do so by the person or company that the data is specifically for. Any data removed will be:

The Chiltern Lift Company Limited, 8 Furlong Road, Bourne End. Buckinghamshire, SL8 5DG
T: 01628 529 247 F: 01628 810821 E: enquiries@chilternlifts.co.uk
Registered in England No: 1090333
www.chilternlifts.co.uk



- Added to an excel spreadsheet or similar
- Sent to the person / or company that has requested the data removal
- Removed from our records

Any data that has been requested for removal will be done so within a 1 month period.

LAWFUL BASIS FOR PROCESSING PERSONAL DATA

We will only process any personal data with a lawful basis, which will be one of the following:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

For more detail on each lawful basis, please visit the [ICO website](#).

CONSENT

Personal data is not processed in for any marketing purposes, and personal data is not sold to third-party for any reason whatsoever.

DATA BREACHES

If, in the event of a data breach, where we believe personal data is stolen from our records, we know this data is not 'sensitive' and is unlikely to cause any customers any difficulties.

We would notify customers that there had been a breach and inform them which data had been taken.

This communication would be via email.

The Chiltern Lift Company Limited, 8 Furlong Road, Bourne End. Buckinghamshire, SL8 5DG

T: 01628 529 247 F: 01628 810821 E: enquiries@chilternlifts.co.uk

Registered in England No: 1090333

www.chilternlifts.co.uk

