

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

THE PURPOSE OF THIS STATEMENT

This policy notice tells you what you can expect us to do with your personal information when you contact us or use one of our services. It applies to information about customers, job applicants, business partners or stakeholders, visitors to our website, and other service users.

We keep our privacy notice under regular review to make sure it is up to date and accurate, so we may update it at any time. We may also notify you in other ways, from time to time, about the processing of your personal information. We will place any updates to this privacy notice here on our website. We encourage you to periodically review the statement to stay informed about how we are helping to protect the information we collect.

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:

- **Personal and Contact information** – name, age, gender, date of birth, relationship status, home address, shipping address, email address, and phone number(s), employment status, caring responsibilities.
- **Behavioural information** – information revealing web browsing, and application usage.

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

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

Registered in England No: 1090333

www.chilternlifts.co.uk



- **Identifiers** – ID numbers, National Insurance number, social security numbers, IP addresses and cookies.
- **Password information or authentication data** – such as user accounts or information that confirms your identity.
- **Photo, audio, or video material in context** – call recordings, surveillance cameras

We also hold more sensitive personal data that requires a higher level of protection. This may include personal data concerning or revealing:

- racial or ethnic origin, religious or philosophical belief;
- a person's sexual orientation;
- gender identity;
- **a person's health** – medical history, prescriptions, relationships with doctors/healthcare providers, physical or mental health including disabilities or impairments, communication and accessibility requirements, and the provision of health care services;
- **criminal offences** – personal data about criminal allegations, proceedings, or convictions.

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 PROTECTION

We apply appropriate technical and organisational measures to ensure your personal information is secure. For example, we have secure customer management systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.

We limit access to your personal information to our employees and contractors working on our behalf, who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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:

- 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.

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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 see below or 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.

STAFF TRAINING

All staff receive induction training regarding this policy within one month of their start date and this training is refreshed annually.

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LAWFUL BASES AND DATA PROTECTION RIGHTS

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details that follow

HOW TO MAKE A COMPLAINT

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details below.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

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The ICO's address:

Information Commissioner's Office
Wycliffe house
Water lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number: 0303 123 1113

Website: www.ico.org.uk/make-a-complaint

CONTACT DETAILS

Email: enquiries@chilternlifts.co.uk

Telephone: 01628 529 247

Or write to: The Chiltern Lift Company Ltd, 8 Furlong Road, Bourne End, Buckinghamshire, SL8 5DG



Signed by: S. Fistorazzi - Managing Director
The Chiltern Lift Company Ltd

Date: 2nd January 2025

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