

Flood & French Ltd

Privacy Policy

Version	Date	Author	Authorised By	Comments
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1. Introduction

In this document Flood & French Ltd will be referred to as the Company; the data subject will be referred to as You.

This privacy policy aims to outline:

- who is responsible for managing Your information;
- what information the Company collect and how the Company will use it;
- who the Company may share Your information with;
- when and how the Company will contact You in the future;
- how long the Company will keep Your information for;
- how the Company uses cookies on the Company's website;
- what rights You have;
- how You can raise a complaint or concern with the Information Commissioner's Office;
- the Company's lawful bases for processing Your data;
- how often the policy should be reviewed and amended.

2. Who is Responsible for Your Information?

The company collecting Your data is Flood & French Ltd; this is normally collected directly from Yourself, or from a third party on Your behalf, either over the telephone, in person, or via email.

The Company is responsible for the collection and proper management of any personal information that You submit. The Company will keep Your personal details secure and use the information You provide with applicable privacy and data protection laws, and only in line with this policy.

3. What Information Does the Company Collect?

The Company will collect Your name, address, telephone number and, where appropriate, Your email address. In some cases, the Company will have to collect and store medical information about You; this is if You are eligible for zero-rated VAT, and the Company is required to securely store Your eligibility form with the Company's tax records.

4. How Does the Company Use this Information?

The information You provide may be used in a number of ways, for example:

- to enable the Company to undertake any plumbing or heating works You have requested the Company to;
- to provide You with the information, products and services You ask for, and honour any contract You have with the Company;
- for analytical purposes, that help the Company evaluate different products and services the Company offers or may offer in the future;
- to contact You, by post, to remind You when Your boiler is due for its annual service (You can opt out of this at any time by calling the office on 01473 213464, or emailing office@floodandfrench.co.uk);
- to manage any customer service or invoice related queries.

5. Who Will the Company Share Your Information With?

In order to provide You with the products and services that the Company offers, the Company may share Your information with other companies and regulatory bodies. The table below explains with who, and in what circumstances, the Company will share Your information:

Company/Regulatory Body	When The Company Will Share Your Information
Commusoft	The Company may share all of the Company's customer's information with Commusoft. They are the organisation that provide the Company with the Company's job management software. The only time they should have access to Your information is if the Company has a technical problem and they need to access the Company's data in order to resolve it.
Sage Group plc	The Company may share all of the Company's customer's information with Sage Group plc. They are the organisation that provide the Company with the Company's accounting software. The only time they should have access to Your information is if the Company has a technical problem and they need to access the Company's data in order to resolve it.

Gas Safe	The Company are legally obligated to inform Gas Safe of any major gas works the Company carries out; this includes sharing the address and name of an occupant – and, where different, the owner – of the property.
Oil Firing Technical Association (OFTEC)	The Company is legally obligated to inform OFTEC of any major oil works the Company carries out; this includes sharing the address and name of an occupant – and, where different, the owner – of the property.
Boiler Manufacturers	If the Company carries out the installation of a new boiler for You, the Company will share Your information with the manufacturer of the boiler, to register Your boiler, so that the boiler has the full warranty/guarantee on it, as part of the Company's contractual obligations to You.
Merchants	If the Company needs to have materials delivered directly to Your property, the Company will share Your address with the Company's suppliers (merchants) to allow this delivery to take place. The Company will make You aware if this needs to be done, and details of what information has been shared, and to who, is available upon request. If the Company needs to order parts and/or materials in order to provide services to You, the Company will use the first line of Your address as an order reference.
Subcontractors	The Company may have to share Your name, address and phone number with one of the Company's subcontractors to allow the Company to complete some works. The Company will make You aware if this needs to be done, and details of what information has been shared, and to who, is available upon request.

If Your data needs to be shared internally, within the company, for example from the office to an engineer, it will only be transferred via a service that supports end-to-end encryption; this means that the information cannot be intercepted during transmission.

6. How and When Will the Company Contact You in the Future?

The Company may contact You by phone or email if the Company believes it to be in the mutual interest of You and the company; however, if You have a service provided by the Company that should be repeated annually, or biennially, then the Company will contact You by post in order to remind You when this is due. You can opt out of this by either calling the Company on 01473 213464, or by emailing office@floodandfrench.co.uk, and requesting that the Company remove You from this system; You will need to provide the Company with Your name and address so that the Company can remove Your property.

7. How Long Will the Company Hold Your Information For?

The Company will store Your information whilst it is required for the relevant purposes, or to meet legal requirements.

For tax purposes the Company is required to keep financial documents for 6 years after the end of the tax year they were produced in. This means if the Company sends You an invoice, the Company is required by law to keep a copy of this for 6 years after the end of the tax year it was produced in, and in doing so the Company will be storing Your address and name for that period as well; this in turn means that the Company will hold Your name and address for 6 years after the end of the tax year the most recent invoice the Company sent You was produced in.

If You gave the Company Your information, for example, to allow the Company to provide You with a quotation; however, You never asked the Company to undertake any work, the Company will keep Your information for one year after the end of the tax year in which You provided the Company with Your information.

If You are employed by the Company, the Company will store Your information for 6 years after the end of the tax year Your employment with the Company ceased; this does not apply to subcontractors.

Subcontractors will have their information stored for 6 years after the end of the tax year that the most recent invoice they issued the Company was produced in.

8. How Does the Company Use Cookies on the Company's Website?

This section aims to outline what cookies are, and how they are used on the Company's website.

8.1 What Are Cookies?

A cookie is a small file, which asks permission to be placed on Your computer's hard drive. Once You agree, the file is added and the cookie helps analyse web traffic, or lets the website know whether or not You have visited that website before; this can allow the website to respond to You as an individual, by tailoring its operations to Your needs, likes and dislikes by gathering and remembering information about Your preferences.

The Company use traffic log cookies on the Company's website to help identify which pages are being used. This helps the Company analyse data about web page traffic and improve the Company's website by tailoring it to customer needs. The Company only use this information for statistical analysis purposes.

Overall, cookies help the Company provide You with a better website, by enabling the Company to monitor which pages You find useful and which You do not. A cookie in no way gives the Company access to Your computer or any information about You, other than the data You choose to share with the Company. You can choose to accept or decline cookies, and will have been asked to do so upon Your first visit to the Company's site.

Cookies deployed by the Company's website:

- ensure that functionality operates as intended;
- remember Your choices and preferences during and between visits;
- allow You to share pages via social network widgets like Facebook and Twitter;
- allow You to interact with the Company's website by leaving comments or opinions;
- post enquiries via the website's Anti-Spam enquiry form;
- track Your visit for statistical analysis, allowing the Company to improve the usability, speed and security of the Company's website.

Cookies are not deployed to:

- collect any personal identifiable information;
- collect any sensitive information;
- pass data to advertising networks;
- pass personally identifiable information to third parties;
- pay sales commissions.

8.2 How Are Cookies Used on the Company's Website?

8.2.1 Analytical Tracking

The Company's website has Google Analytics installed, which allows the Company to track and compile anonymous visitor statistics. The information collected ranges from simple traffic volume to the type of browser You are viewing the Company's website with. This information is valuable to the Company, not just for marketing analysis and quantification, but to improve the usability, security and load speed of the Company's website content. Google Analytics is a popular, secure, flagship webmaster product from Google. The privacy and security of Google Analytics is a high priority at Google, that You can read more about on Google's Analytics Data Safeguarding page, found at this website address:

<https://support.google.com/analytics/answer/6004245/>

Google also offer a Google Analytics Opt-out Browser Add-on that will allow You to automatically opt-out of all websites that track Your activity via Google Analytics. This can be downloaded from this website address:

<https://tools.google.com/dlpage/gaoptout/>

No personal information is collected by Google Analytics.

8.2.2 Cookie Consent Check

As mentioned in subsection 8.1, upon Your first visit to the Company's website, You will be asked to accept or decline cookies being deployed by the website. In order for the Company's website to remember Your choice of opting-in, the Company store an anonymous cookie to remove the cookie banner for 28 days. This cookie will not be stored if You opt-out of receiving cookies. If You have opted-in, but wish to remove the cookies deployed by the Company's website, please clear Your cookies from within Your browser settings.

8.2.3 Wix.com

The Company's website, either in full or in part, is built using the company Wix.com. Wix.com utilise cookies to allow visitors to register, login and comment on the Company's website content. They also deploy cookies for security reasons and to allow them to perform analytics.

8.2.4 Enquiry Forms

Visitors can choose to contact the Company via enquiry form(s) on the website. In order to prevent spam enquiries, the Company protects their forms with a 'CAPTCHA' challenge to ensure the submission is from a living person, rather than a computer bot. This CAPTCHA challenge creates a cookie that is only used to check the input response from the user is correct. The CAPTCHA cookie does not store any other information from Your enquiry.

8.2.5 Google Maps/Places

The Company's website may have the Company's Google Maps/Places profile embedded within an iframe. Google Maps creates cookies that enable the functionality of their powerful mapping software. No personal information is stored or shared on the cookies deployed by Google Maps/Places.

8.3 Actual Cookies Deployed

On the next page is a table of information, which lists all cookies deployed and used on the Company's website.

Cookie Category	Cookie Name	Cookie Description
Google	_utma	A Google Analytics cookie, which keeps track of the number of times a visitor has been to a website, when their first visit was and when their last visit occurred.
	_utmb	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor enters a website
	_utmc	A Google Analytics cookie, which creates a timestamp of the exact moment when a visitor leaves a website.
	_utmz	Used for reporting in Google Analytics, classifying the visitor.
	_utmz	A Google Analytics cookie, which tracks where the visitor came from, what search engine was used, what link was clicked on, what keywords were used and where in the world a website was accessed from.
	PREF, NID	This cookie is set by Google Maps when You load a map of the Company's location.
Wix.com	svSession	Creates activities and business information (analytics).
	hs	All of these cookies are deployed for security purposes.
	incap_ses_\${Proxy-ID}_\${Site-ID}	
	incap_visid_\${Proxy-ID}_\${Site-ID}	
	nlbi_{ID}	
	XSRF-TOKEN	
	smSession	Identify logged in site members.

9. How Do the Company Use Personal Data on Their Website?

The Company will only collect and process data in line with this policy; however, the Company's website is built using wix.com. Your data may be stored by wix.com through their data storage, databases, and the general wix.com application. They store Your data on a secure server behind a firewall.

For more information about wix.com, please read their terms of use and privacy policy, which can be found at the links below.

Wix.com's Terms of Use: <https://www.wix.com/about/terms-of-use>

Wix.com's Privacy Policy: <https://www.wix.com/about/privacy>

10. What Rights Do You Have?

You are given several rights under the General Data Protection Regulations (GDPR). These include:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object;
- rights in relation to automated decision making and profiling.

10.1 The Right to be Informed

This right means that the Company is obligated to provide fair processing information, which is set out in this document. The regulations emphasise the need for transparency over how the Company uses Your information. The Company feels this document explains all You need to know about how the Company uses Your personal data; however, if there is something You do not understand, please call the Company on 01473 213464 and the Company will try to help You better understand this document and make any necessary changes.

10.2 The Right of Access

This right means that You have the right to access Your personal data and supplementary information; this should allow You to be aware of and verify the lawfulness of the processing the Company carries out.

Under the GDPR, You have the right to obtain: confirmation that Your data is being processed; access to Your personal data; other supplementary information.

If You wish to be provided with a copy of the information that the Company holds about You, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, requesting access to Your information – You will need to provide Your name and address - and the Company will be able to provide this to You, free of charge, within one month of the request being made.

10.3 The Right to Rectification

Under the GDPR, You have a right to have Your data corrected if it is inaccurate or incomplete. If the Company has disclosed the information to third parties, the details of which are outlined in section 5 of this policy, then the Company must inform them of the rectification; You can ask the Company to inform You of who the recipients of Your information are.

If You wish to exercise this right, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, requesting an amendment to Your information – You will need to provide the name and address the Company holds for you - and the Company will be able to rectify this to You, free of charge, within one month of the request being made.

10.4 The Right to Erasure

This right is often also known as ‘the right to be forgotten’. You can request that the Company deletes or removes Your personal data, if there is no compelling reason for its continued processing. This right applies if:

- the personal data collected is no longer necessary for the purpose for which it was originally collected or processed;
- the Company rely on Your consent for lawful processing of Your information and You have withdrawn Your consent;
- You object to the processing and there is no overriding lawful basis for the Company to continue the processing; the personal data was unlawfully processed;
- the personal data needs to be erased in order to comply with a legal obligation;

- the personal data is being processed in relation to the offer of information society services to a child.

If the Company has disclosed the information to third parties, the details of which are outlined in section 5 of this policy, then the Company must inform them of the erasure; You can ask the Company to inform You of who the recipients of Your information are.

The Company can refuse to comply with a request for erasure, when one of the following applies:

- to exercise the right of freedom of expression and information;
- to exercise or defence of legal claims.

If there is a lawful basis for processing Your personal data that overrides Your request for erasure, then the Company will fully explain this to You.

If You wish to exercise this right, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, requesting erasure of Your information – You will need to provide Your name and address - and the Company will be able to carry this out for You within one week, provided the circumstances in which the Company can refuse to erase Your personal data are not met.

10.5 The Right to Restrict Processing

You have a right to restrict or suppress the processing of Your personal data; this means that the Company is permitted to store the personal data, but not permitted to process the personal data any further. The Company will hold enough information about You to ensure that the restriction is respected in the future.

You can exercise this right in the following circumstances:

- where You contest the accuracy of the personal data, the Company will restrict the processing until the Company has verified the accuracy of the personal data;
- where You have objected to the processing, and the Company is considering whether or not the Company's legitimate interests override Yours (more information on Your right to object is available in subsection 8.7);
- where the processing is unlawful and You oppose erasure of Your data for restriction instead;
- if the Company no longer needs the personal data but You requires the data to establish, exercise or defend a legal claim.

If You wish to exercise this right, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, requesting restriction of Your processing – You will need to provide

Your name and address - and the Company will be able to carry this out for You, provided the circumstances in which the Company can refuse to restrict Your personal data are not met.

10.6 The Right to Data Portability

The right to data portability allows You to obtain and reuse Your personal data for Your own purposes across different services. It allows You to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

- to personal data You have provided to the Company;
- where the processing is based on Your consent, or for the performance of a contract; and
- when processing is carried out by automated means.

If You wish to exercise this right, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, requesting transfer of Your data, stating the reason You would like Your data transferred – You will need to provide Your name and address - and the Company will be able to carry this out for You, provided the circumstances outlined above are met.

10.7 The Right to Object

Under the GDPR, You have the right to object to processing based on legitimate interests (more information about legitimate interests as a lawful basis for processing is available in subsection 10.1), direct marketing and processing for the purposes of scientific/historical research and statistics.

In order to object to processing of Your personal data, You must have an objection on “grounds relating to his or her particular situation”. Once You have let the Company know that You object to the processing and Your reasons for objecting, the Company will immediately restrict the processing of Your data (more information about the restriction of processing can be found in subsection 8.5), whilst the Company evaluates whether or not the Company can demonstrate compelling legitimate interests as the basis for processing Your personal data, which override Your interests, rights and freedoms. The Company are permitted to continue to process Your personal data, if the processing is being carried out for the establishment, exercise or defence of legal claims.

If the Company has compelling legitimate grounds for the processing of Your personal data that override Your objection, then the Company will inform You before the restriction of processing is lifted.

If You wish to exercise this right, please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, stating that You object to the processing of Your data, and the reason You object to Your personal data being processed – You will need to provide Your name and address - and the Company will immediately restrict the processing of Your data, whilst an evaluation of whether or not the Company has compelling legitimate grounds to process Your personal data, which override Your interests, rights and freedoms takes place.

10.8 Rights Related to Automated Decision Making, Including Profiling

The GDPR has provisions on automated individual decision-making (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual), and applies to all automated individual decision-making and profiling. Organisations can only carry out this type of decision-making if the decision is:

- necessary for the entry into or performance of a contract; or
- authorised by Union or Member state law applicable to the controller; or
- based on the individual's explicit consent.

The Company does not carry out any automated individual decision-making or profiling.

If You have any concerns surrounding automated individual decision-making or profiling, then please either call the Company on 01473 213464, or email help@floodandfrench.co.uk, stating Your concerns around automated individual decision-making or profiling – You may need to provide Your name and address - and the Company will address Your concerns to the best of the Company's ability.

11. How Can You Raise a Complaint with the Information Commissioner's Office?

If You believe that the Company has been unable, or unwilling, to resolve Your information rights concern, You can raise the matter with the Information Commissioner's Office (ICO). The ICO will use the information You provide them, including the Company's response to Your concerns, to decide if Your concern provides an opportunity to improve information rights practice.

If the ICO think Your concern does provide that opportunity, then they will take appropriate action; this could take a variety of forms. The ICO state that You should raise the matter with them within three months of Your last meaningful contact with the Company.

If You would like more information surrounding raising a concern with the Company, the ICO have produced information to help You. This can be found at the following website address:

<https://ico.org.uk/for-the-public/raising-concerns/>

If You would still like to raise Your concern directly with the ICO, then You can do so by either calling their helpline on 0303 123 1113, or by navigating to the website address below, and clicking on the link to start a live web-chat.

<https://ico.org.uk/concerns/>

12. What are the Company's Lawful Bases for Processing Your Data?

This section aims to outline:

- what a lawful basis for processing personal data is;
- what the lawful bases relevant to the Company mean;
- which lawful bases the Company relies on to process Your personal data.

12.1 What is a Lawful Basis for Processing Data?

The first principle of the GDPR requires the Company to process all personal data lawfully, fairly and in a transparent manner. Processing is only lawful if the Company has a lawful basis under Article 6 of the GDPR.

The requirement to have a lawful basis in order to process data is not new. It replaces and mirrors the previous requirements to satisfy one of the 'conditions for processing' under the Data Protection Act 1998 (DPA); however, the GDPR places more emphasis on being accountable for and transparent about the lawful basis for processing the Company relies on.

There are six lawful bases for processing data under the GDPR, which are broadly similar to the old conditions for processing, although there are some differences. The six lawful bases for processing data under the GDPR are:

- Consent – You have given clear consent for the Company to process Your personal data for a specific purpose;
- Contractual Obligation – the processing is necessary for a contract the Company has with You, or because You have asked the Company to take specific steps before entering into a contract;
- Legal Obligation – the processing is necessary for the Company to comply with the law;
- Vital Interests – the processing is necessary to protect someone's life.
- Public Task – the processing is necessary to carry out a task in the public interest or for a public authority to carry out its official functions.

- Legitimate Interests – the processing is necessary for the Company's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect Your personal data which overrides those legitimate interests.

All six of the lawful bases for processing data state the processing must be necessary. The processing being necessary does not mean it has to be essential, instead, it must be a targeted and proportionate way of achieving the purpose. Any of the six lawful bases will not apply if the Company can reasonably achieve the purpose by some other, less intrusive means.

The GDPR also classifies some data as special category data. The only special category data the Company processes is personal data concerning health, the processing of which is prohibited under Article 9 of the GDPR, unless the Company can satisfy both a lawful basis and a special category condition for processing the data.

12.2 Which Lawful Bases Does the Company Rely On and What Do they Mean?

The Company relies on three of the six lawful bases for processing Your data. These are contractual obligation, legal obligation and legitimate interests. The Company also relies on the special category condition outlined in Article 9(2)(a) of the GDPR. This states, "the data subject has given explicit consent to the processing of those personal data for one or more specified purposes..."

12.2.1 Contractual Obligation as a Lawful Basis

The Company uses contractual obligation as a lawful basis for processing personal data when You have a contract in place with the Company.

Article 6(1)(b) outlines using contractual obligations as a lawful basis for processing personal data by stating that the, "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".

What this means is that the Company may process Your personal data if the Company have a contract in place with You, or You have asked the Company to take steps before entering into a contract with You, and the processing of Your personal data is a targeted and proportionate way of:

- achieving one of the Company's contractual obligations to You; or
- achieving something that You have asked the Company to do before You enter into a contract with the Company.

An example of this would be if You asked the Company for a quotation to install a new boiler. The Company enters into a contract with the customer every time the Company installs a new boiler, therefore providing a quotation for the installation of a new boiler is seen as a step taken on Your request before You enter into a Contract with the Company. If You choose to accept the quotation, then the Company will continue to process Your personal data to fulfil the Company's contractual obligations to You. This may include sharing Your personal data with a third party (more information on who the Company shares Your data with and under what circumstances is available in section 5 of this document).

If the Company needs to process any special category data in order to fulfil the Company's contractual obligations to You, then the Company will rely on the special category condition outlined in sub-subsection 11.2.4.

12.2.2 Legal Obligation as a Lawful Basis

The Company uses legal obligation as a lawful basis for processing personal data when the Company is required to process the personal data to comply with a common law or statutory obligation.

Article 6(1)(c) outlines using legal obligations as a lawful basis for processing personal data by stating that the, "processing is necessary for compliance with a legal obligation to which the controller is subject".

What this means is that the Company may process Your personal data if the Company has to comply with a common law or statutory obligation, and the processing of Your personal data is a targeted and proportionate way of complying with the Company's legal obligations.

An example of this would be if the Company had just undertaken some work for You, after which the Company issues You an invoice. For tax purposes, the Company is legally obligated to keep financial documents, which would include a copy of this invoice, for 6 years after the end of the tax year it was produced in. Therefore, the Company will store Your name and address for this period, as this information is on the invoice.

If the Company needs to process any special category data in order to fulfil the Company's legal obligations, for example, if You are eligible for zero-rated VAT and the Company must store Your eligibility form, which may have information concerning Your health, with the Company's tax records, then the Company will rely on the special category condition outlined in sub-subsection 11.2.4.

12.2.3 Legitimate Interests as a Lawful Basis

The Company uses legitimate interests as a lawful basis for processing personal data when the Company has collected Your data and need to process it in a way that the Company believes You would expect it to be processed, in order to carry out the Company's routine activities that cannot be carried out in another reasonable and less intrusive way.

Article 6(1)(f) outlines using legitimate interests as a lawful basis for processing personal data by stating that the, “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 freedom of the data subject which require protection of personal data, in particular where the data subject is a child”.

What this means is that the Company may process Your personal data if the Company is pursuing a legitimate interest, such as carrying out the Company’s routine activities, provided that there is no other reasonable and less intrusive way of pursuing them. The use of legitimate interests as a lawful basis for processing can be overridden if the processing is likely to have an impact on You, or Your data is being used in a way that could be considered unexpected. If the Company has a compelling reason to continue to process Your data, then the processing is permitted as long as the impact on You is minimal and justified.

An example of this would be if You asked the Company to undertake some work for You at Your property. In order to undertake the work, the Company will need to process Your name, address and phone number. This is part of the Company’s routine activities, and You would expect the Company to process Your data in this way; there is minimal impact on Your privacy.

If the Company needs to process any special category data in order to fulfil the Company’s legitimate interests, then the Company will rely on the special category condition outlined in subsection 11.2.4.

12.2.4 Explicit Consent as a Special Category Data Condition

Under the GDPR, special category data is more sensitive than other data and so needs more protection. In order to lawfully process special category data, the Company must have both a lawful basis for processing the data under Article 6 of the GDPR, as well as a special category condition under Article 9 of the GDPR.

The Company only processes special category data which concerns health, as the Company must store zero-rated VAT eligibility forms, which may contain data concerning health, with the Company’s tax records.

The Company relies on the condition outlined in Article 9(2)(a) in order to process special category data, which states, “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject”.

This means that the Company can only process this type of data with Your explicit consent, which the Company will obtain via a paper form. Please be aware that if You are unwilling to give the Company Your consent to process special category data, then the Company may be unable to charge You at zero-rated VAT.

13. How Often Should this Policy be Reviewed and Amended?

The Company will review this policy at intervals of one year. The policy will only be amended as necessary.

If a change of legislation could affect this policy, then the Company will review this policy before the change of legislation will come into effect.