

Privacy Notice

We are committed to ensuring that your privacy is protected. We will only use the information that we collect about you lawfully.

Introduction

This privacy notice is for the processing of personal information obtained for ADS Cooling Ltd own requirements as a Data Controller.

The purpose of this notice is to explain to you how we control, process, handle and protect your personal information, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Key definitions

- "I", "our", "us", or "we" refer to the business, ADS Cooling Ltd.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.
- "Personal data" is defined in Article 4(1) of the GDPR: "(1) 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."





Information you may provide

- You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise electronic or hard formatted methods. The information you give us may include the following Categories of personal information and special Categories of personal information:
- Internal **Authenticating**: Information used to authenticate an individual with something they know such as: Passwords, Pin, Mothers maiden name etc.
- Internal **Preference**: Information about an individual's preferences or interests such as: Opinions, intentions, interests, likes, dislikes, etc.
- External **Identifying**: Information that uniquely or semi-uniquely identifies a specific individual such as: Name, user-name, unique identifier, pictures, biometric data etc.
- External **Ethnicity**: Information that describes an individual's origins and lineage such as: Race, national or ethnic origin, languages spoken, dialects, accents etc.
- External **Medical and Health**: Information that describes an individual's health, medical conditions or health care such as: Physical or mental health, drug test results, disabilities, health records etc.
- External **Physical Characteristic**: Information that describes an individual's physical characteristics such as: Heights, weight, age, hair colour, skin tone, tattoos, gender identity etc.
- Financial **Accounts**: Information that describes an individual's financial account such as: Credit Card Number, Bank account details etc.
- Financial **Transactional**: Information that describes an individual's financial account such as: Credit Card Number, Bank account etc.
- Financial **Credit**: Information about an individual's reputation with regards to money such as: Credit records, Credit rating, credit capacity, etc.
- Social Professional: Information about an individual's education or professional career such as: Job titles, salary, work history, school history, employment history, references, certification, disciplinary actions etc.
- Social **Criminal**: Information about an individual's criminal activity such as: Convictions, charges, criminal records etc.
- Social **Public Life**: Information about an individual's public life such as: Character, social status, marital status, religion, political affiliations etc.
- Social **Communication**: Information communication from or to an individual such as: Telephone recordings, voice mail, email etc.





- Tracking **Computer Device**: Information about a device that an individual's user for personal information such as: IP Address, browsers history, etc.
- Tracking **Contact**: Information that provides a mechanism for contacting an individual's such as: Email Address, Physical Address, and Telephone Number etc.
- Tracking **Location**: Information about an individual's Locations such as: Country, GPS locations, building numbers, room numbers etc.

Information we collect about you

With regard to each of your visits to our website we may automatically collect the following information;

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

Personal information we may collect to provide you with the service you require:

- Names
- Addresses
- Telephone numbers
- Email address

All personal mentioned above is processed securely within Sage software.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.





Lawful basis for processing personal information

- Contractual all necessary requirements for provisioning services for you Article 6

 (1)(b)
- Legal Obligation Statutory reporting including, financial, Health and Safety, employee and crime management purposed Article 6 (1)(c)
- Legitimate Interests where processing is necessary to fulfil business requirements while having a minimal privacy impact Article 6 (1)(f)
- If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

The reason we use this basis

- To provide you with information about other services we offer that are similar to those that you have already enquired about;
- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- Data will be retained in accordance to required regulations.
- We process your information in the following ways:
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer
- As part of our efforts to keep our website safe and secure.

Where we store your personal data

Your personal data will be held securely in accordance with our internal security policy, contractual obligations and the law. If we intend to transfer your data outside the European Economic Area (EEA) we will always obtain your consent first.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk.





Your individual rights

Under the GDPR your rights are as follows.

- The Right to be informed this covers the data we hold on you and how it is processed.
- The Right of access the GDPR Articles 1 15 and Recital 63 makes the provision to make a Subject Access Request (SAR) we will provide confirmation of data is being processed; access to their personal data; and other supplementary information. This will be provided free of charge within 1 month of proof of a valid request.
- The Right to rectification request inaccurate personal data rectified, or completed if it is incomplete. This request can be made verbally or in writing. This will be actioned within one calendar month.
- The Right to erasure (right to be forgotten) Individuals can make a request for erasure verbally or in writing. All requests will be actioned within one calendar month but the right is not absolute and only applies in certain circumstances.
- The Right to restrict processing This is not an absolute right and only applies in certain circumstances. We may still store the personal data, but not use it. The request can be made verbally or in writing and we will respond within one calendar month.
- The Right to object this includes processing based on legitimate interests or the direct marketing.
- The Right to data Portability.
- The Rights in relation to automated decision making and profiling.

You also have the right to complain to the <u>ICO</u> if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR. No fee required – with some exceptions you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may be charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.





What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond - We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated..

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

ADS Cooling Ltd Unit 3a Herald Industrial Est Hedge End Southampton SO30 2JW

For more information regarding this please email: info@adscooling.co.uk

