

S.O.S PLUMBING LIMITED

Protecting your Privacy

At **SOS Plumbing Limited** we handle your information in a secure and confidential manner and always in accordance with the law, including the Data Protection Act 1998 (and its replacement the General Data Protection Regulation 2016). We will never disclose your personal information to third parties unless there is a legal basis for this, for example registration of warranties and as required to comply with gas safe regulations.

Summary – How we use your data

We only collect necessary personal data which is passed on by you to us to process the services/sale requested of us and reminders and information relating to servicing/requested jobs as necessary.

Where we have been requested to provide services that are performed on an annual basis such as a gas safety inspection or an appliance service, we will automatically send you a yearly reminder no more than 1 month prior to the expiration/service date due by your preferred method of contact.

Where we have been requested to carry out a Gas Safety Inspection or appliance service, we will automatically provide an electronic Gas Safety Certificate or Service Record via our job management system provided by Commusoft.

Where you have opted to take out a consumer credit agreement for one of our boiler installations, your details will be provided to our finance provider Hitachi Capital Finance in order to complete a credit check.

Where you have requested services from us that include a boiler installation, your information will be passed to the manufacturer Worcester Bosch for the purpose of registering the boiler warranty only and to Gas Safe for the purpose of notifications of work which is a safety and legal requirement.

We will retain your information for as long as your account is active or as needed to provide you services. We may ask to send you emails or post from time to time, but you always have the right to say no or opt-out.

If you have any concerns or questions about how we protect your privacy, please see the following full privacy policy or alternatively contact the team at sosplumbing@btconnect.com.

S.O.S Plumbing Limited – ICO Registration No: ZA108427

May 2018 / AJ.SOS

Legal and Privacy

We here at S.O.S Plumbing Limited take your privacy seriously and therefore ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us in the event you have a complaint.

This policy applies to:

(i) all those who visit our website, mobile applications, or who have had face to face contact with one of our employees;

(ii) business customers (including Letting Agents & Estate Agents)

(iii) consumers (including homeowners)

to that extent relevant to those individuals and except where the policy indicates otherwise.

1. WHO WE ARE

S.O.S Plumbing Limited, providing plumbing and central heating services to you will only use your personal information as confirmed to us by yourselves to administer your account and to provide the products and services that have been requested from us. We will handle your information in a secure and confidential manner and always in accordance with the law, including the Data Protection Act 1998 (and its replacement the General Data Protection Regulation 2016). We will never disclose your personal information to third parties unless there is a legal basis for this, for example registration of warranties and as required to comply with gas safe regulations.

2. S.O.S PLUMBING LIMITED RESPECTS YOUR PRIVACY

The protection of your privacy in the processing of your personal data is an important concern, which we pay special attention to during our business operations. We use ("process") your personal data collected during your visit to our website and when you provide your personal data to us in other ways, in a confidential manner and solely in accordance with the law including the General Data Protection Regulation ("GDPR").

3. THE PERSONAL DATA WE COLLECT AND USE

Information collected by us

If you are a consumer (including homeowners)

We may collect your personal data when you provide it to us through our website, if you write to us or telephone our offices or if you provide your details to us through a third party (including through the Worcester Bosch website).

The personal data which we collect about you may include your name, postal address, your email address, contact telephone number, credit card details and details of any comments or

feedback which you provide to us. Any credit card details provided to us to settle invoices will be processed via Worldpay and once authorised are no longer held by us. All information is stored in a secure system.

If you are a business customer

We may collect your personal data when you provide it to us through our website or when you purchase products or make enquiries about our products and services, enter a competition, register to use our website. We may collect this information directly through the website or if you provide your details over the telephone, or by post.

We may collect your name, billing address, delivery address details, your email address, contact telephone number and in the case of Letting Agents/Estate Agents those details of tenants/customers' addresses, telephone numbers etc. which you or a third party provides to us as required for us to carry out the services requested of us. It is the Agent's responsibility to gain consent for these details to be passed on to us enabling us to provide the relevant service.

We may also require your credit card details for payment etc., however once authorised and processed through Worldpay are no longer held by us.

We may collect and process records of any correspondence and communications with us and a record of transaction history and details of transactions conducted on our site or through our website is kept by us together with details of the fulfilment of any order.

We may receive personal information about you from other sources for example from Worcester Bosch as we are an Accredited Installer, from consumers who register their products with us and from third parties who work with us in connection with our sites and services. We may also obtain your personal data through third parties such as the Gas Safe Register. Third-party service providers may, without limitation, be appointed to provide technical support, process your transactions and maintain your accounts or to run promotions or marketing campaigns. We may have access to any personal information provided to such vendors, service providers and third party e-commerce services.

We may monitor, record, store and use any telephone, email or other communication you provide in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

What other information do we collect?

As you move around our site, subject to appropriate consents being obtained, we will collect information about your visit, such as which pages you visit, how often you visit and what links you click on.

This will include technical information such as Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, operating system and platform and information about your visit such as the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; 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 and any phone number used to call our customer service number. To improve the services we provide, we also use Google Analytics to provide data for the above mentioned activity as well as general site performance and usage statistics.

We may also receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that personal data that it may be shared internally and combined with personal data collected on this site for the purposes set out in this policy, including helping us to build a profile of you to get to know you better, and so that we can personalise and enhance your customer experience with us.

4. HOW DO WE USE YOUR PERSONAL INFORMATION?

Information you give to us.

We will use this information:

- to carry out our obligations to provide you with the information, products and services that you request from us;
- to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements;
- to send you a confirmation of job requests and associated certificates and invoices etc.
- to provide you with information about other services or products we offer that are similar to those that you have already purchased, or services or products you have consented to receiving on the site or; to notify you about changes to our services and/or products;
- to store details of your appliances and history enabling us to deal with breakdowns/repairs as necessary to enhance your customer experience and to provide customer support; and/or

Please note we will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments paid by you for our products and services or due to you by agreement (e.g. refunds).

Information we collect about you.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers / users in respect of unlawful, disruptive or objectionable behaviour on our premises or on our website;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- to enhance our website experience to ensure you receive a personalised and continuously improving customer service;
- to allow you to participate in interactive features of our website, when you choose to do so;
- as part of our efforts to keep our website safe and secure;
- to deliver effective and personalised marketing material as requested by you
- build a profile of you and your appliances
- to make suggestions and recommendations to you and other users of our site or services about goods or services that may interest you or them.

Information we receive from third parties

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on the following conditions, depending on the activities we are carrying out:

- Compliance with legal obligations: As an entity established under the laws of England and Wales, S.O.S Limited is obliged to comply with UK laws and guidance provided by UK regulatory bodies. In particular, we may need to process your personal data to verify your identity, establish your age, verify your source of funds for anti-money laundering and fraud purposes, and to establish whether you have been barred from any stores which stock our products or from using our site due to objectionable behaviour. We are also legally obliged to process your personal data in accordance with gas safety regulations and to register any warranties. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.
- Necessary for the entry into / performance of a contract: When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under such contract (e.g. to allow you to purchase goods from us), we will need to collect and process your personal data. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our goods / services to you.
- Consent: We may send you marketing messages by email, text message or telephone about us and our products and offers where you have not unsubscribed and where you have purchased products or other services from us. We may also send you information by post on the products and services which we provide which we believe may be of interest to you. We provide easy ways to stop our marketing, and you can opt out at any time by emailing us at sosplumbing@btconnect.com.

If you are not a customer of ours but you have provided us with consent to use your details for marketing purposes, then we may also contact you about our products and services.

If you have confirmed that you would like to receive recommendations from us about other the products and services of other companies then we will use your details to contact you with information about such products and services.

In each of the situations above, you have the right to withdraw your consent at any time and can object to processing of this nature.

Legitimate interests: To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. This requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws. We will

always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

6. HOW LONG WE KEEP YOUR INFORMATION FOR

Your data will be held as long as an active customer and we have not been requested to delete your information. For accounts purposes all information has to be held for a period of at least 6 years as per legal requirements.

7. MARKETING

We want to keep you informed about all our products, promotions and news, and where you have indicated you are happy to receive marketing by email, SMS or phone we will keep in touch with the latest news. We may also send you relevant information on products and services which we think may be of interest to you - you can easily opt out of this at any time by contacting as indicated below.

If you are an existing customer, we will contact you by e-mail, SMS, post or phone with information about products and services similar to those which you have already purchased from us.

If you prefer not to continue to receive promotional or marketing information from us please email sosplumbing@btconnect.com.

8. DISCLOSURES

We may disclose your personal data to those companies as required legally to process the service requested by you i.e. gas safe, warranty registrations with Worcester Bosch and card processing payment with Worldpay, all of whom have their own privacy policies.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; e.g. service providers who operate elements of our site service and process personal data on our behalf.
- third party suppliers and service providers for the purposes listed under How do we use your personal information? above;
- third party suppliers and service providers to the extent they assist our Group with its legal / regulatory obligations e.g. providers of services in respect of anti-money laundering, fraud, verification etc.;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties such as DRP; and
- your employer, educational institution (e.g. school, college or university), email or internet provider, parents (if you are under the age of 18) or law enforcement agencies, or other appropriate third parties, where we consider your behaviour to be unlawful, offensive, inappropriate or objectionable;

We will only disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of S.O.S Plumbing Limited
- if S.O.S Plumbing Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- to protect the rights, property or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations (including without limitation, other third parties, your employer, educational institution, email or internet provider, your parents (if you are under the age of 18) and law enforcement agencies) for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements or in order to enforce or apply our terms of use and other agreements, or otherwise for the prevention or detection of fraud or crime.
- In assessing your request for goods or services, we may use your personal data for the purposes of the prevention and detection of fraud. One of the purposes for which we may disclose your address and postcode details is to check against the IMRG Security Alert or any other Fraud Prevention Scheme. At all times where we disclose your personal data it will remain secure.

9. WHERE WE STORE YOUR PERSONAL DATA

The personal data that we collect from you is stored on secure information technology systems which are operated on our behalf by third parties. Some data processing in relation to web and email services and delivery of any products ordered by you is carried out on our behalf by a third party. Where Google Analytics are used, the data may be stored outside of the EEA. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy and data protection law.

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 personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

10. PROTECTING YOUR INFORMATION

Our site uses up-to-date industry procedures to protect your personal information. We also protect the security of your data during transmission using Secure Sockets Layer (SSL) encryption software. We may vary this in the future if we feel you will benefit from greater security whilst using our site.

Cookies

Our site does not use cookies at present.

11. THIRD PARTY SERVICES

Regarding any links to third-party websites that are operated by providers that are not associated with us, after you click the link, we no longer have any influence over the collection, storage, or processing of any personal data transmitted by clicking the link (such as IP address or URL of

the page that contains the link), as the behaviour of third parties is, by nature, beyond our control.

Please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12. YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal data, although these are not absolute and in some instances, we may be unable to accept your request, in which case we will respond to you to explain why. These are set out **below**. You may contact us using the details on our site (or by contacting us directly – details **below**) to exercise any of these rights and we will respond to any request received from you within one month from the date of the request.

A right to access personal data held by us about you.

- A right to access personal data held by us about you.
- A right to require us to rectify any inaccurate personal data held by us about you.
- A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
- In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
- In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. This right will only apply where the processing is based on consent or a contract (see above) and the processing is carried out by automated means. You also have the right to require us to transfer this personal data to another organisation, at your request
- A right to object to our processing of personal data held by us about you where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defence of legal claims.
- A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you.
- A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

13. UPDATING YOUR INFORMATION

If you believe your details are incorrect you can amend your details by contacting us at the address provided below.

14. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

This policy was last reviewed and updated: May 2018

15. CONTACT

If you have any questions, comments or requests regarding this Privacy Policy, we will be happy to answer them. Please email for the Attention of the **Data Protection Officer to sosplumbing@btconnect.com**

Please address any questions, comments and requests regarding our data processing practices to us in this way in the first instance. Please remember to include your name, address and postcode along with any correspondence reference you may have

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office.

S.O.S Plumbing Limited – May 2018