

Data Protection Policy

Ecosafe Heating Ltd ta Ecosafe Group requires to keep certain information about its Employees, customers, and suppliers for financial and commercial reasons, such as to pay salaries to staff, keep records of training and for health and safety purposes. In addition, as a large part of our business involves work to domestic rented properties we will, for a limited period, require to hold data on residents for contact and access arrangements.

Personal Data includes data in our possession related to any living individual and which can be used, either directly or in conjunction with other data, to identify that individual. Personal Data can be factual (such as a name, address or date of birth) or it can be subjective (such as an opinion about that person, their actions and behaviour).

Personal Data must be:

1. Processed fairly, lawfully, and transparently and not be processed unless certain conditions are met.

To do this, Personal Data must only be processed for one of a very few reasons. These include, amongst other things, only processing data where we have the Data Subject's Consent to the processing, or the processing is necessary for the performance of a contract with the Data Subject – such as an employment contract. Sensitive Personal Data is a special category that must be handled with extra care. This data may only be processed with the Explicit Consent of the Data Subject.

2. Collected for specified, explicit and legitimate purposes, and the Data Controller shall limit the processing of that Personal Data to only what is necessary to meet the specified purpose or purposes.
3. Adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Accurate and, where necessary, kept up to date
5. Not be kept for longer than is necessary for the purpose or purposes for which it was collected.
6. Processed in accordance with the rights of Data Subject. The Data Subject has rights:-
 - a. of access to a copy of the information comprised in their Personal Data;
 - b. to object to processing that is likely to cause or is causing damage or distress;
 - c. to prevent processing for direct marketing;
 - d. to object to decisions being taken by Automated Means;
 - e. in certain circumstances to have inaccurate Personal Data rectified, blocked, erased or destroyed; and

- f. to claim compensation for damages caused by a breach of the General Data Protection Regulation ((EU) 2016/679) (GDPR).
7. Processed in a manner that ensures appropriate security of the Personal Data to ward against unauthorised or unlawful processing, accidental loss, destruction of, or damage to, Personal Data.

Further detailed information on the Data Protection Act 1998, the GDPR and Personal Data, beyond the principles laid out above, can be found by visiting the website of the Information Commissioner's Office www.ico.org.uk

Ecosafe Group and all the companies within its group are committed to protecting and respecting your privacy. In this privacy policy, the terms "we", "our", "us" are used to refer to Ecosafe Group and all relevant subsidiaries.

Information on Residents

In addition, as a large part of our business involves work to domestic rented properties we will, for a limited period, require holding data on residents for contact and access arrangements. Ecosafe Group are provided with Residents' details from our customers – their landlords, generally local authorities, and housing associations. This is necessary for us to locate the properties, contact residents and make access arrangements, and for general communication during the works. Unless by prior agreement, information is limited to:

- Name
- Address
- Phone and/or email contact
- Any special considerations regarding for example disabilities or vulnerabilities.

This information is required only for the duration of each task, usually a matter of days or weeks, and is automatically deleted from our system as each task is confirmed complete.

Information on Employees

The following information sheet is provided to all employees, as part of their offer package:

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Information we may collect from you.

We will collect and process the following data about you:

1. Information you give us. This is information about you that you give us by filling in forms during induction and training. The information you give us may include your name, date of birth, address, e-mail address, phone number, next of kin details, photograph, national insurance number, trade, training records, qualifications, accreditations and CSCS card details. You may also provide us with Sensitive Personal Data. This includes data relating to your health, racial or ethnic origin, sexual orientation or religious or philosophical beliefs.
2. Information we collect about you. Regarding each of your visits to our internal platforms and CRM systems, we may automatically collect the following information:
 - i. 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.

By collecting this information, we ensure that content from the site is presented in the most effective manner for you and for your computer.

How We Use Your Information

We use information held about you in the following ways:

1. Information you give to us. We will use this information:
 - o to provide you with a biometric face/finger/thumb print scan uploaded to enable the use of a biometric
 - o access terminal.
 - o to track and monitor working time and entry/exit logs for security access control,
 - o to record working time and subcontractor timesheet records,
 - o to record training records, qualifications, accreditations and Construction Skills Certification Scheme
 - o cards
 - o to monitor training, qualification and accreditation records for resource planning
 - o for statutory and/or contractual reporting requirements on sustainability and estimated CFC emissions re: parties travelling to and from Ecosafe Group sites for Ecosafe Group customers and/or public authorities.
 - o for reporting to authorised Ecosafe Group management/representatives who have a business need to know,
 - o for the administration and maintenance of our Simpro System including sharing with third party suppliers and processors who provide and maintain the System i.e. Human Recognition Systems limited where necessary for this purpose;

- where necessary to support establishing and/or defending or pursuing potential legal claims,
 - carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us; and/or
 - to notify you about changes to the portal.
 - Information we collect about you. We will use this information:
 - to administer the portal and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your
 - computer; and/or
 - as part of our efforts to keep our site safe and secure.
2. Information we receive from other sources. 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).

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 two conditions, depending on the activities we are carrying out:

- Consent: We may provide you with information about the portal where you have provided your explicit
- consent for us to do so.
- 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 you with access to our sites and record and maintain training records and access logs.

Ecosafe will ensure that the collection and processing of your personal data:

- is kept to a minimum with regards to the amount of data collected and the extent of any processing.
- will not be overly intrusive to you; and
- will be proportionate to meet our legitimate interests, as above.

How Long We Keep Your Information For

When your data is no longer required for the purposes listed above, we will delete it as soon as possible but, in any event, within 15 years.

Disclosure of your information

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;
- Ecosafe directors and managers, and third-party suppliers and service providers for the purposes listed under 'How We Use Your Information' above.
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties.
- law enforcement or fraud prevention agencies, as well as our legal advisers etc. we will disclose your personal information to third parties.
- if we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- if we, or substantially all our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal data to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. We will take reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

Your rights

You have several rights under data protection law in relation to the way we process your personal data. 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.

Please address any questions, comments and requests regarding our data processing practices to info@ecosafegroup.co.uk.

Right 1

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

Right 2

A right to require us to rectify any inaccurate personal data held by us about you.

Right 3

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).

Right 4

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 you require the data for the purposes of dealing with legal claims.

Right 5

A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.

Right 6

A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).

Right 7

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).

On occasion we are required to report certain diversity statistics. To do this, we may undertake automated profiling. We do not store this information.

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. Their address is:

First Contact Team
Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Changes To This Privacy Policy

Any changes to this privacy policy in the future will be notified to you directly through Management.