

# **PRIVACY NOTICE**

## **CELESTIAL WINDOWS AND CONSERVATORIES LIMITED**

Unit 1 Simcox Court, Riverside Park Industrial Estate, Middlesbrough North Yorkshire, TS2 1UX

Celestial Windows and Conservatories Limited is authorised and regulated by the Financial Conduct Authority FRN 734463. We act as a credit broker not a lender and offer finance options from a panel of lenders.

Reviewed: 31.07.2025

## How we use your personal information

Please read this privacy notice to understand how we use and protect the information you provide to us. Your information will be held by Celestial Windows & Conservatories Limited.

We are committed to protecting your personal data at all times, this policy will outline your rights, the laws protecting you and how we will manage your data when you visit our website, contact us, enquire and or purchase from us and or contact us for pre and post installation services.

#### Who we are

We are a Data Controller under the terms of UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018.

We are **Celestial Windows and Conservatories Limited** Company Number **07204959.** 

ICO Registration Reference: Z243907X

We are authorised and regulated by the Financial Conduct Authority FRN **734463**. We act as a credit broker not a lender and offer finance to our customers from a panel of lenders.

#### Our contact details are:

Unit 1-Simcox Court Riverside Park Industrial Estate Middlesbrough North Yorkshire TS2 1UX

Tel: 01642881244 Email: atif@celestialwindows.co.uk

If you have any questions about this policy or would like to enact any of your Data Protection rights, you can contact us via the above means.

Should you be dissatisfied with our responses or you decide you do not wish to contact us directly, you have the right to make a complaint about us at any time to the Information Commissioners Office (ICO), the regulator for data protection.

You can contact the Information Commissioner by calling 0303 123 1113 or online at www.ico.org.uk/concerns

This policy is reviewed regularly, and the date of the last review will be visible on the first page of the document.

## Data protection law and how it protects you

Data protection law requires us to manage all personal information in accordance with the data protection principles. We are required to process your personal information fairly and lawfully. This means you are entitled to know how we intend to use any information you provide. You can then choose whether you want to give it to us so we can provide the product or service you require.

## Why we process Personal Data (what is the "purpose")

"Process" means we use, obtain, store, update and archive data.

- 1. Personal data is held for the purpose of providing customers with appropriate, high quality, finance options from a panel of lenders.
- 2. Special Category Data (Example health) is held for the purpose of providing support to our more vulnerable customers.
- 3. Contractors' data is held for the purpose of managing their contracts.

## The Data we may collect

We may use, collect, store and transfer personal data or personal information about you. This means information which may identify you in some way. To ensure clarity we have compiled a breakdown below of the types of data:

<u>Identity Data</u> – which would include any legal or known names, marital status, title, date of birth and gender. Should you visit one of our premises this would include CCTV footage. An example of this would be recording your preferred pronouns to ensure our team address you in the correct manner.

<u>Contact Data</u> – Installation or delivery addresses, invoice or contact address, restrictions at these premises, email addresses and telephone numbers.

<u>Transaction Data</u> – This data would include any payments to and from you and details of past purchases or refunds between yourself and us.

<u>Financial Data</u> – We do not hold any information supplied to our finance partners; we would not store payment card details. Bank details maybe stored to enable us to refund monies owed.

<u>Technical Data</u> - We do not hold or have access to any technical data such as IP address or device information.

<u>Marketing and Communications Data</u> – We will hold information regarding your preferences for receipt of marketing and communication from our company.

<u>We also collect Aggregated Data</u> – This information is to allow review our marketing and digital presence and example of this maybe to view how many visitors to our website viewed a certain page. However, this information is not considered personal data as it will not directly or indirectly identify you. This is often referred to as a digital footprint.

<u>Special Category Data</u> - At times we may collect and store Special Category Data about you, we would only do this to support you with your enquiry, purchase, appointment / customer care support or to ensure decision making capability. For example: You may be suffering with a health condition or disability which requires us to make reasonable adjustments to fulfil your contract.

We do not collect any information about criminal convictions or offences.

We do not collect or store any information about your race or ethnicity, religious or philosophical beliefs, sex life sexual orientation, political opinions, trade union membership, genetic or biometric data.

## **Recorded Phone Calls**

Our phone system automatically records all calls (this is notified to you when you call us on an automated message). We use the calls to monitor our conversations with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes and to help improve our quality of service. Conversations will also be monitored for staff training purposes.

#### Other Business Information we hold:

- Directors, shareholders, and staff of our business partners.
- Staff employment data.
- Contractors' data.

## Refusal to provide personal data

In the event our usual working practice requires us to collect personal data, and you choose not to disclose this to us, it may hinder our ability to fulfil our contact with you or provide you with information you have requested from us. Should this happen, we may have to cancel a product or service you have requested, we would ensure you are fully aware of this and would let you know in good time.

## **Collection of Data**

We only collect information when someone contacts us directly or via our trusted suppliers or commercial clients. This may be in one of the following ways:

## **Direct Collection**

You may provide us with information about yourself to request information about a product or service, enter a competition, provide us with feedback, request an appointment. This maybe via our website, phone lines, email, what's app, letter, social media interactions or leaving our company a review on a review service

## Third parties or publicly available sources.

This would be an indirect contact with us via trusted supplier or partnership websites for example via Quickslide, Check a Trade or Icotherm websites when looking for a local product installer.

## **Commercial Clients**

As we provide services to commercial clients your housing association, landlord or other trusted company may ask us to contact you on their behalf to arrange works or appointments and will therefore share your personal data with us to enable us to complete the work.

## How will your Personal Data be used, stored and shared

Your personal data will only be used when the law allows us to:

- For the purposes of performing the contract we hold with you or proposing.
- Where our legitimate interest makes it necessary for us to and your interest and rights do not override this.
- Where we are bound by legal obligations.

Whilst we do not rely on consent as a legal basis to process your personal data we may ask for your consent to received marketing communications from us. However, you have the right to withdraw this consent at any time, you can do this by contacting us on the details above.

On page 8 you can find a description of any way in which we may use your personal data and which legal basis we rely on to do that. We may use more than one legal basis to process your personal data. If you have any questions about this, you are welcome to contact us to discuss this.

Where we rely on legitimate interest as a legal basis to process your personal data, we may not always complete a Legitimate Interest Assessment (LIA). This may be because some of our processing activities may fall under

recognised legitimate interests under the Data (Use and Access) Act 2025. These are pre-approved legitimate interests which allow us to perform our activities easily and lawfully.

## Marketing

We will never call you unless you have provided us or a trusted supplier with your details to request quotation or have had previous work completed by us (existing customer relationship).

We will regularly cross check our records against Telephone Preference Service (TPS) and the Mail Preference Service (MPS). We will also ensure if you have asked us to not call you in the future our customer relationship management system is updated with your preference to opt out of any further contacts.

We will never share your personal data with any other third-party companies for marketing purposes.

You can "Opt Out" by asking us to stop sending you marketing information or calls at any time by contacting us on the details provided above or:

 $\textbf{Email -} \underline{sales@celestialwindows.co.uk}$ 

Call or Whatsapp - 01642 213394

If you have requested to Opt Out of any marketing contact from our company this will not apply to the personal data you provided to us as a result of purchase, guarantee registration or other transaction.

## **Cookies**

Cookies are small files that websites like ours store on your device when you visit a page, they remember information about your last visit to the page which make your access smoother and more personalised to you. You can change your browser settings to refuse all or some cookies or to notify you when a website is wanting to use cookies. But this may effect your experience when using our website. Our Cookie Policy can be found on our website which contains more information on how we use cookies and how long they are stored on your device.

### **Data Accuracy**

We do not carry out any checks on the personal data you provide to us, if you notify us of a change to your personal data we will enact that changes on our internal systems as soon as possible.

## **Change of Purpose**

When we collect your personal data we will only use it for the purpose in which it was collected.

All of the types of personal data use and the legal basis which enables us to do this is detailed in the table above. If at any point there is a change of purpose in the way we use your personal data (which is outside of the original purpose) we will notify you of this and explain the legal basis which allows us to do this.

Please note we may process your personal data without your knowledge or consent in accordance with the above, where this is required or permitted by law.

## **Disclosures of Your Personal Data**

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* included in this privacy policy. This will only ever be done securely and whom we may share with and the reasons for this are:

- Service providers who provide network, system and IT support to our business
- Trusted subcontractors or product suppliers whom we may ask to deliver products directly to your installation address, support with installation or carry out inspections.
- Personal data may be shared with our lender panel who need to be involved in their regulatory requirements. Personal data is also be stored for back-up purposes with our computer software suppliers who store it securely.
- FENSA & Home Improvement Protection Ltd to deliver your FENSA certification and insurance backed guarantee as per your contract terms (if applicable)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also share other personal data such as employment data with government agencies.

## **Data Location**

All of our third party relationships are based withing the UK and will not transfer your personal data outside of the UK, all data centres used by them and us and held in the UK.

## **Data Security**

We have strict data security measures in place which protect your personal data from loss, unlawful processing, unauthorised access, alteration or disclosure.

We also take appropriate measures to ensure the information disclosed to us is kept secure, accurate and up-to-date and kept only for as long as necessary for the purposes which it is used.

We limit access to our internal systems which hold personal information to a selected group of authorised users who are given access to such systems using a unique identifier and password. Access to personal information is limited to and provided to individuals for the purpose of performing their work duties.

Any third party needing to support your installation would only be provided with the limited data they need to carry out their work and this will be subject to a duty of confidentiality.

We have internal procedures in place to deal with any suspected personal data breaches, and we will notify you and any applicable regulator of a breach where legally required to do so.

## **Data Retention**

We will only retain your personal data for as long as reasonably practicable to fulfil the purpose in which it was collected including the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. Under normal circumstances we will retain contract information for a period of 10 years from installation date in order to manage your guarantee period.

Any recorded calls are automatically deleted from our telecommunication system after three years.

If we feel a call contains information we may need to keep in order to support you or your product guarantee we may download them from the system and hold them on your customer file within our Customer Relationship Management system. We will then retain the call and it will be deleted with the rest of your information at the end of its business life cycle.

We may hold data longer than this to enable us to support customers with product upkeep or repairs after the guarantee period also.

We may retain your personal data for a longer period in the event of a complaint or if we believe there is a prospect of litigation in respect of our business relationship with you.

We will archive (that is, store it without further action) for as long as is required for legal purposes as recommended by the regulators.

We may at times anonymise your personal data (which means it would no longer be able to identify you directly or indirectly). In which case we may use this information indefinitely without notifying you.

## **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. There are:

**Right of access** to the personal data we hold for you, to receive a copy of this data and other supplementary information such as how we are processing it. This is often referred to as a Data Subject Access Request or SAR.

Right to be informed about the collection and use of the personal data we hold about you.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Right to rectification** to have any inaccurate personal data we hold to be rectified or completed if it is incomplete.

**Right to erasure** to request we delete personal data which we hold about you were there is no legitimate reason for us to hold your data.

**Right to restrict processing (object to processing)** you can request that we restrict or supress any processing of your personal data.

Right to data portability which allows you to obtain and reuse your personal data for your own purpose.

**Right to object** to the processing of your personal data in certain circumstances.

**Rights related to automated decision-making including profiling** which our company does not carry out but our third-party finance providers may.

In order to exercise any of these rights please contact:

atif@celestialwindows.co.uk

Call 01642 213394 and ask to speak to Atif Dinsdale (Data Protection Lead).

You can also write to: FAO: Data Protection Lead, Celestial Windows & Conservatories Limited, Unit 1 Simcox Court, Middlesbrough, TS2 1UX

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we do have the right to charge a reasonable fee if your request is deemed to be unfounded, repetitive or excessive. We also have the right to refuse to company with your request in these circumstances.

To process a request from you to exercise any of your rights above, we may need to ask you to confirm your identity. This is to ensure your personal data is always secure and is not disclosed to or amended or removed by someone who does not have the right to access. We may also ask you to provide clarification regarding your request to ensure we have understood correctly. If we need you to provide clarification or ID we will do this without delay.

In line with UK GDPR we aim to comply with all requested within one month of your request. If we are unable to meet these timescales, we will notify you of this in the first month and provide a reason for the delay. We may be required in certain circumstances where the request is complex or multiple requests have been made, to extend the request by up to two months to help us gather the required information.

## **Right to Complain**

You have the right to complain to us as the data controller if you believe we have not complied with the relevant data protection practices required by law. We will respond to your complaint within 30 working days as required by the Data (Use and Access) Act 2025. If you are unhappy with our complaints process or feel we have not dealt with it appropriately, you have the right to escalate your complaint to the Information Commissioner's Office.

More information on Data Protection Rights are available from the Information Commissioners Office at:
<a href="https://www.ico.org.uk">www.ico.org.uk</a> or by calling: 0303 123 1113.

## Purposes for how we use your personal data

| f data   | Lawful basis for processing including basis of legitimate interest   |
|----------|--|
| ntity    | Performance of a contract with you   |
| ntact    |  |
| ntity    | (a) Performance of a contract with you   |
| ntact    | (b) Necessary for our legitimate interests (to provide you with a quotation after request from you to do so, complete a review and contract signature with you or carry out a technical survey / inspection or remedial works) |
| ntity    | (a) Performance of a contract with you   |
| ntact    | (b) Necessary for our legitimate interests (to recover monies owed)  |
| ancial   |  |
| nsaction |  |
| ntity    | (a) Performance of a contract with you   |
| icity    | (a) i chemiane of a contract war you   |
| ntact    | (b) Necessary to comply with a legal obligation  |
| file     | (c) Necessary for our legitimate interests (to ensure we are delivering the best possible service to our customers)  |
| ntity    | (a) Necessary for our legitimate interests (to ensure business continuity, network security and business growth into new digital technologies)   |
| ntact    | (b) Necessary to comply with a legal obligation  |
| hnical   |  |
| ntity    | Necessary for our legitimate interests (to ensure safety for our customers and staff)  |
| ntity    | (a) your consent (which you can opt out at anytime)  |
| ntact    | (b) Necessary for our legitimate interests   |
|          |  |