



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.

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**.

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.

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.

Your rights

We think carefully about how we use your information. We always aim to use it in a way that's fair to you. You might prefer us not to use it for some purposes. You have a legal right to:

- Ask us to provide you with copies of your personal information, make corrections or sometimes ask us to delete it.
- Object to our processing of your information in some circumstances. For example, to ask us not to share your personal information for online advertising.
- Complain to the UK Information Commissioner's Office by visiting ico.org.uk. We may not always be able to stop processing your information, such as if we're using it to help protect you or others.

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:

Identity Data – 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.

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

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

Financial Data – We do not hold any information supplied to our finance partners, we would not store payment card details. Bank details may be stored to enable us to refund monies owed.

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

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

We also collect **Aggregated Data** – 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.

At times we may collect and store **Special Category Data** about you, we would only do this in order to support you with your enquiry, purchase, service calls 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.

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.

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 ourselves 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

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 make 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,

Below 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.

Purposes for how we use your personal data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To create an entry on our CRM system to enable us to carry out our contract with you or to provide you with a quotation after you request one.	(a) Identity	Performance of a contract with you
	(b) Contact	
Visit your property	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(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)
To programme and install your products	(a) Identity	(a) Performance of a contract with you
(a) Manage payments, fees and charges	(b) Contact	(b) Necessary for our legitimate interests (to recover monies owed)

(b) Collect and recover money owed to us	(c) Financial	
	(d) Transaction	
To manage our relationship with you which may include:	(a) Identity	(a) Performance of a contract with you
(a) Notifying you about changes to our terms or privacy policy	(b) Contact	(b) Necessary to comply with a legal obligation
(b) Asking you to leave a review	(c) Profile	(c) Necessary for our legitimate interests (to ensure we are delivering the best possible service to our customers)
To administer and protect our business and its online presence (to include updating our customer relationship management system, data analysis, testing, troubleshooting).	(a) Identity	(a) Necessary for our legitimate interests (to ensure business continuity, network security and business growth into new digital technologies)
	(b) Contact	(b) Necessary to comply with a legal obligation
	(c) Technical	
To ensure security and safety of our customers, staff buildings and property	(a) Identity	Necessary for our legitimate interests (to ensure safety for our customers and staff)
To check your installation went well, your products are still working well and see if we can offer any other works	(a) Identity	(a) your consent (which you can opt out at anytime)
	(b) Contact	(b) Necessary for our legitimate interests

In the event that a complaint is made to an outside agency, i.e Checkatrade, FENSA, Trading Standard etc, we may need to release some data held on the system that pertains to your installation in order to resolve the issue.

Marketing

We will never call you unless you have provided us 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.

Opting Out

You can ask us to stop sending you marketing information or calls at any time by contacting us:

sales@celestialwindows.co.uk

01642 213394 To call or Whatsapp

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.

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.

- 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.
- Our finance partners who provide you with credit via our trusted partner Sherman Finance
- 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.

Data Location

All of our third party relationships are based within the UK and will not transfer your personal data outside of the UK.

Data Security

We have strict data security measures in place which protect your personal data from loss, unauthorised access, alteration or disclosure. We only allow access to your personal data by staff, third parties or contractors who have a business need to access and they will only process your personal data on our strict instruction which is 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. 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 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.

You may be able to ask us to delete your data as per your rights detailed below.

You Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

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 where 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 suppress 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.

Fees

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 comply with your request in these circumstances.

What we need from you

In order 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 secure at all times 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.

Time Limits

In line with UK GDPR we aim to comply with all requests within one month of your request. If we are unable to meet these timescales we will notify you of this in good time.

Types of Personal Data

The firm holds personal data in the following categories:

1. Directors, shareholders, and staff of our business partners.
2. Staff employment data.
3. Contractors' data.
4. Customer data.

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

"Process" means we 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. Staff employment data is held in accordance with Employment, Taxation and Pensions law.
4. Contractors' data is held for the purpose of managing their contracts.

What is the Lawful Basis for processing Personal Data?

The Law says we must tell you this:

1. We hold personal data because it is in our Legitimate Interest to do so. Without holding the data we cannot work effectively.
2. We hold staff employment data because it is a Legal Obligation for us to do so.
3. We hold contractors' data because it is needed to Fulfil a Contract with us.

Who might we share your data with?

We can only share data if it is done securely, and it is necessary to do so.

1. 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.
2. Employment data will be shared with government agencies such as HMRC.
3. Personal identification data will be shared with our lending partners.

How long is the Personal Data stored for?

1. We will store Personal data for as long as we are providing a service of introduction, 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 normally hold this information for ten years.

2. We must store employment data for six years after an employee has left.
3. We must store contractors' data for seven years after the contract is ended.

What if you are not happy or wish to raise a concern about our data processing?

You can complain in the first instance to the office manager, and we will do our best to resolve the matter. If this fails, you can complain to the Information Commissioner at www.ico.org.uk/concerns or by calling 0303 123 1113.

Where we obtain the information

Your personal information will be held securely by Celestial so we can (either now or in the future) manage your relationship with us. This will include information you provide when you contact us, and any additional information provided by you. We will not retain your personal information for longer than is necessary to provide a service to you, which will be long longer than 10 years from year of installation.

We may occasionally collect and hold personal information which is highly sensitive in nature, under data protection law this is known as special categories of data. This is usually only related to health or vulnerability matters which you bring to our attention to help us understand how best we can support you.

How we may contact you

Using your personal information to contact you about products and services, we may contact you for marketing purposes, by mail, telephone, email or text message about products and services available from us.

You have the right to withdraw, object to, or change your marketing preferences at any time, once you do this we will ensure this is marked on your file and you will not be contacted again.

Recording phone calls

We will monitor or record phone calls 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.

How we protect your information

We are committed to taking appropriate technical, physical and organisational measures to protect customer and colleague personal information against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction. 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 through the use of a unique identifier and password. Access to personal information is limited to and provided to individuals for the purpose of performing their work duties.

Digital Footprint

When you browse the web, you leave a digital footprint. It's information about your device and the way you use it online.

We just want to let you know that we'll collect this information about you. Most websites do this. We use this information to deliver the website to you. We also use it for other things, which we think help you and us.

We use your information to help protect you and ourselves against fraud or crime. For example, our service providers look at all use of our website to help block malicious activity. This helps keep you and us safe.

We may ask our lending partner to use that information to:

- Check your eligibility for their personal loans
- Check affordability for their personal loans.
- Send our adverts to you.
- Advertise to people who have a similar profile to you or share your interests.
- Identify what other marketing may be of interest to you.
- Understand how useful our marketing is and make it better

