



Our Privacy Notice



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Updated May 2019

Introduction:

This Privacy Policy applies to Personal Information held by Kent Klear Window Cleaning Services and its' Contractors as data controllers, as described below. It explains what information we collect about you, how we'll use that information and who we'll share that with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. It continues to apply even if your agreement with Kent Klear with us ends.

Where necessary we will use Sub Contractors and self employed individuals who will also act as data controllers and will adhere to our Privacy Policy at all times.

What information we collect:

We will only collect the necessary information we require to provide you with our service.

Information that you provide to us, e.g:

We only collect it from yourselves, or anyone in your household. This information will include:

- Personal details, e.g. name, gender (by default i.e. Mr, Mrs or Ms - if that is how you address yourself to us);
- Contact details, e.g. address, email address, landline or mobile number;
- Company Name if applicable;
- Cleaning requirements along with the cost of that clean, any specifics of what we have cleaned in the past, along with any other information that enables us to perform our service;
- Your chosen payment method(s);
- Other information about you that you give us by communicating with us, whether face to face, email, text message, online or phone call etc;
- Any other information which you deem as relevant, e.g. spouse with terminal condition or illness that we should not hold transactions with.

Information that we collect or generate about you, e.g:

- Your chosen financial information, whether it is the email address that you provide for us to invoice via PayPal, or your name on your bank account which we see when you make payment via Bank Transfer for example;
- Information we use to identify and authenticate you and your transactions;
- Details and information concerning complaints and disputes;
- Information included in customer documentation, e.g. a record of letters delivered to you about a change in our service to you;
- Marketing and sales information, e.g. details of the services you have requested information on, you have received and paid for and your preferences for said service(s);
- Geographic information, e.g. which area you live in to fit in with our cleaning schedules;
- Dates of your payments - this does not include a database of a credit risk rating using algorithms etc, it does however include your regularity by default for example, the information of when the last payment was owed from is necessary, if there is a dispute. So for example, if you've not paid for 4 months, the information we hold will state, the month it is owed from and the cycle we are in. It may be that you believe that payment was made therefore, both Kent Klear and yourself will need to establish if it's been paid by what method, when and investigate if the chosen method hasn't been received. Why and how it can be retrieved if at all, or speak to the financial institution that is in charge of this method of payment. It could be used to determine whether

you have passed the required time to make a payment and therefore our agreement with yourselves will be terminated.

Why we collect the information that we do:

- To deliver our services;
- Carry out your instructions, e.g. to fulfil a payment request, or make a change to our information;
- Manage our relationship with you;
- Manage risk - again this does not include a database of credit risk rating nor an automated algorithm;
- Ensure business continuity, to ensure all payments are logged correctly and therefore cleaning continues;
- Recover money which you owe (where you haven't paid for the service provided);
- Your chosen payment method, so that we know which service provider to look for to find your payments;
- For clarity, to ensure that if there is a discrepancy with information, we can look back to check our records;
- Records of correspondence - this is to ensure that messages are not missed and forgotten. With the office dealing with various methods of communication and it being such a small company, we ensure your request is being dealt with. It also ensures that any message from yourselves is recorded in a timely fashion and that it is kept for 6 years to ensure that any changes can be reflected back on at a later date.

How we'll use your information:

We do not pass any information you have given us onto third parties that are not instructed to work for us, unless you have given your permission for us to do so.

We'll only use your information where we have your consent or we have another lawful reason for using it. These reasons include:

- Need to process the information to carry out an agreement we have with you;
- Need to process the information to comply with a legal obligation;
- Need to establish, exercise or defend our legal rights.

The reasons we use your information:

- Deliver our products and services;
- Carry out your instructions, e.g. to fulfil a payment request, or make changes to your cleaning requirements;
- Support our cleaning operations;
- Update, scheduling, planning development and administrative purposes;
- Recover money which you owe (where you haven't paid in the usual manner in the timely manner we expect either by your silence or by noticeable pattern change).
- Market Research, e.g. information and opinions expressed when participating in market research which is conducted only by ourselves and only to improve our service.

How we make decisions about you:

We use human decisions to decide how your account is dealt with and how your account is continued or terminated.

Tracking or recording what you say or do:

To help you receive the service you require any communications from yourself either via phonecalls, face to face meetings, letters, emails, or via social media will be kept and or recorded in note form. We use all communications you have with us to check instructions to us, to assess, refer to at a later date if needed, train staff, improve our service and to prevent fraud. We may also capture additional information about these interactions, e.g. telephone numbers that you call us from, we use closed circuit television (CCTV) in and around our office, in our vehicles and on occasion on our person these may collect photos or video's of you, these are to prevent against burglary, damage and fraud.

Information we collect from other sources:

We do not actively seek to collect information from other sources about you. We may on occasion receive information given to us by your family or friends that you wish for us to contact you, only on this occasion will we make contact first.

Compliance with laws:

We keep your information for 6 years to comply with the United Kingdom Tax laws.

Marketing and market research:

We do not use your personal information to send you information about our other services. Our other services can be found on the Clean Card you are issued with at every clean, if you wish to know more about our other services, you are free to call us at your convenience, we do not promote them to you by using any other method than the Clean Card, the signage on our vehicles, or when you call regarding an issue and our other services may benefit you or when you request more information.

We may on occasion ask for your opinion on a particular part of our service if we are wishing to improve that service or to find out whether you are happy with that service. This will be done by either your chosen method of communication or by the only method we have available. This information will only be used for the reason for that which it was intended.

Who and why we might share your information with:

We share your information with our employees and Sub Contractors which they need:

- in order to provide you with the service you have requested;
- in order to update records accurately;
- in order to take payment for the service you have requested;
- be made aware of any changes from their first point of contact with yourself, for example a change in your cleaning requirements;
- to organise and if necessary alter cleaning schedules;
- other business continuity procedures;
- to recover debts owed;
- check our company records for your data to confirm that Kent Klear has the correct information on yourself.

We may share your information with regulatory bodies for lawful purposes:

- other regulatory bodies for example law enforcement, courts, dispute resolution bodies, auditors, tax regulators;
- other parties involved in any disputes, including disputed transactions and services;
- anyone who provides instructions or operates any of your accounts on your behalf, e.g. Power of Attorney, solicitors, intermediaries etc;
- anybody else that we have been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf.

How long we'll keep your information:

We keep your information for 6 years in line with our data retention policy and UK Tax Laws. For example, we'll normally keep your core transaction data for just over a period of 6 years. from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

Your rights

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it;
- in some circumstances, the right to withdraw your consent to our processing of your information, which you can do at anytime. We may continue to process your information if we have another legitimate reason for doing so;
- in some circumstances, the right to receive certain information you have provided to us in an electronic form;
- the right to request that we rectify your information if it's inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information. We may continue to retain your

information if we're entitled or are required to retain it;

- the right to object to, and to request that we restrict our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict our processing of your information but we're entitled to continue processing your information and / or to refuse that request.

What we need from you

You're responsible for making sure the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible. If you provide information for another person (e.g. a joint account holder, a beneficiary or dependant), you'll need to direct them to this notice.

How we keep your information secure

We use a range of measures to keep your information safe and secure. We require our staff and any Sub Contractors who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

How we process your information

We'll use your information for purposes including:

- to deliver our service, administer your accounts or process your transactions;
- to identify possible service improvements, for example if there is a quality issue that is not completely out of our control, this information will be logged to ensure this occurrence doesn't happen again;
- to protect our legal rights, for example in the defence of protection of legal rights and interests (e.g. pursuing debts, enforcing or protecting our security or defending rights of intellectual property); court action; managing complaints or disputes; in the event of a restructuring of the company or other mergers or acquisition. This may be in connection with action taken against you or other persons. e.g. joint account holders or persons who give a guarantee or other security for your obligations to us. We'd do this on the basis that it's in our legitimate interest to do so.

More details about your information

If you'd like further information on anything we've said in this Privacy Notice, or to contact our Data Protection Officer, at Kent Klear Window Cleaning Services, 6 St Aidan's Way, Gravesend, Kent, DA12 4AQ addressed 'For the attention of the DPO'.

This Privacy Notice may be updated from time to time and the most recent version can be found at www.kkwcs.com

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Issued by Kent Klear Window Cleaning Services

Registered Office: 6 St Aidan's Way, Gravesend, Kent, DA12 4AQ.

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KKWCS/0519/PP