

PH247 LIMITED **PRIVACY POLICY**



We ask that you read this website privacy policy 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 and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

•	<i>Who we are</i>
•	<i>Our website</i>
•	<i>Our collection and use of your personal information</i>
•	<i>Our legal basis for processing your personal information</i>
•	<i>Change of purpose</i>
•	<i>Data retention</i>
•	<i>Who we share your personal information with</i>
•	<i>Whether information has to be provided by you, and if so why</i>
•	<i>Transfer of your information out of the UK and EEA</i>
•	<i>Promotional offers from us</i>
•	<i>Marketing</i>
•	<i>Your rights</i>
•	<i>Keeping your personal information secure</i>
•	<i>How to complain</i>
•	<i>Changes to this website privacy policy</i>
•	<i>How to contact us</i>
•	<i>Do you need extra help?</i>

Website privacy policy

Who are we?

This website is operated by PH247 Limited (company number 12662331) (collectively referred to as “we”, “us” or “our” in this privacy policy). We are the controller and are responsible for your personal data.

We are a plumbing and heating service provider and for more information see our about us page at <https://www.ph247.co.uk/about/>.

We collect, use and are responsible for certain personal information about you. When we do so we will comply with the General Data Protection Regulation which applies across the European Union and the United Kingdom and the Data Protection Act 2018. We are responsible as ‘controller’ of that personal information for the purposes of those laws.

Our website

This privacy policy relates to your use of our website, <https://www.ph247.co.uk>, only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to **Facebook, Twitter, Instagram, LinkedIn and Gas Safe** . These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

Our collection and use of your personal information

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together, follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, home address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.



We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the contract you have with us but we will notify you if this is the case at the time.

This website is not intended for use by children and we do not knowingly collect or use personal information relating to children.

We collect personal information about you when you access our website, register with us, contact us, send us feedback, purchase services via our website, post material to our website and complete customer surveys or participate in competitions via our website.

We collect this personal information from you either directly, such as when you register with us, contact us or purchase services via our website.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - o Analytics providers such as Google based outside the EU;
 - o Advertising networks; and
 - o Search information providers.
- Contact Data, Financial Data and Transaction Data from providers of technical, payment and delivery services.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.



The legal bases we may rely on include:

- **Consent:** where you have given us clear consent for us to process your personal information for a specific purpose.
- **Contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations).
- **Vital interests:** where our use of your personal information is necessary to protect you or someone else's life.
- **Legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Further information
***the personal
information
we collect,
when and how
we use it***

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Data Retention period
To register you as a new customer	(a) Identity Data (b) Contact Data	Performance of a contract with you	For as long as an account is in operation and in order to comply with legislation
To open an account for you.	(a) Identity Data (b) Contact Data	Performance of a contract with you	For as long as an account is in operation and in order to comply with legislation
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	For as long as an account is in operation and in order to comply with legislation thereafter
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)	For as long as an account is in operation and in order to comply with legislation thereafter
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	For as long as an account is in operation and in order to comply with legislation thereafter
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)	operation and in order to comply with legislation thereafter
To use data analytics to improve our websites, services, marketing,	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of	For as long as an account is in operation and in order to
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	Necessary for our legitimate interests (to develop our services and grow our business)	For as long as an account is in operation and in order to comply with legislation thereafter

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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



Data retention

How long will you use my personal data for?

- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- Details of retention periods for different aspects of your personal data are set out in the table above.
- In some circumstances you can ask us to delete your data under a request erasure, please contact us for further information.
- In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who we share your personal information with

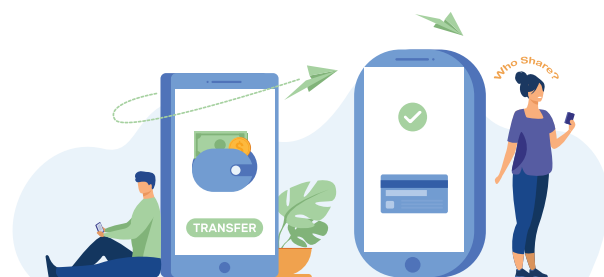
We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties
 - o Service providers based in the United Kingdom who provide IT and system administration services, and delivery and courier services.
 - o Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, accountants and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
 - o HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
 - o Credit reference agencies and other fraud prevention agencies acting as processors or joint controllers who provide credit worthiness information.
 - o Client relationship management services providers (we currently use SmartPA Global Ltd) who are based in the UK and provide client relationship management and stock and sales systems.
 - o Subcontractors based in the United Kingdom that have been directly contracted by PH247 to complete the intended plumbing and heating service(s) your have purchased or asked a quote for.
- Specific third parties:
 - o analytics providers such as Google based outside the EU;
 - o advertising networks; and
 - o search information providers.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

Who we share your personal information with

We require you to provide Identity Data and Contact Data to provide you with our service(s). We will inform you at the point of collecting information from you, whether you are required to provide the information to us.



Transfer of your information out of the UK and EEA

We do not transfer your personal data outside the European Economic Area (EEA).

Promotional offers from us

We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or used our service(s) or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.



Marketing

We would like to send you information about services, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes when you complete our online order form for the first time.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by contacting us at info@ph247.co.uk.

It may take up to 5 working days for this to take place.



For more information on your rights in relation to marketing, see 'Your rights' below.

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your use personal information.
- Access to your personal information and to certain other supplementary information (at no charge) .However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- Require us to correct any mistakes in your information which we hold.
- Require the erasure of personal information concerning you in certain situations.
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object at any time to processing of personal information concerning you for direct marketing.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal information.
- Otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.



If you would like to exercise any of those rights, please:

- Email at info@ph247.co.uk or call on 02037642713 or write to us at 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX;
- Let us have enough information to identify you by your name, address, email address and (if applicable) job number);
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know the information to which your request relates including any account or reference numbers, if you have them.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

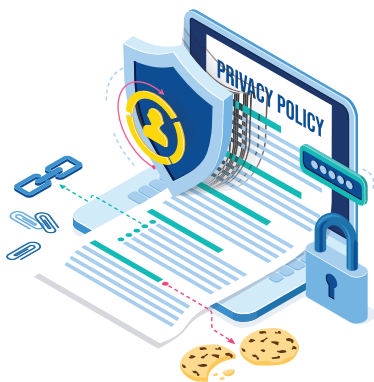
If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.



How to complaint

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: **0303 123 1113**.



Changes to this website privacy policy

This website privacy policy was published on **04/12/20** and last updated on **04/12/20**.

We may change this website privacy policy from time to time, when we do we will inform you via your email address.

How to contact us

Please contact us, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to

info@ph247.co.uk; write to **27 Old Gloucester Street, London, United Kingdom, WC1N 3AX** or call **02037642713**.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).

