

Updated 24 May 2018.

## **GDPR DATA PROTECTION & PRIVACY POLICY**

### **Scope of this policy**

This privacy policy sets out how we, Lindum Fire services Ltd (LFS) use customer personal information. This includes what the customer tells us, what we learn from the customer, and the choices they give us about what marketing they want us to send them. This policy explains how we do this and explains privacy rights and how the law protects customers. It has been amended to cover the upcoming implementation of the new General Data Protection Regulation (GDPR). Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act (DPA) which we already comply with.

### **Our Privacy Promise**

Lindum Fire Services Ltd is committed to protecting the privacy of your information. We promise to:

Keep all customer data safe and private

Not to sell or share customer data

Give the customer ways to manage and review marketing choices (where used), at any time.

### **How personal information is used by Lindum Fire Services Ltd**

LFS will initially capture, process and retain customer data that is obtained through telephone, email or the Lindum Fire services website when a customer requests goods, services or information. This data will be used for the purposes of:

- Creating a customer profile on our in-house data systems
- Processing customer orders and servicing
- Creating and issuing customer invoices
- Monitoring orders, servicing and customer account statuses
- Debt chasing

### **Where we collect personal information from**

We may collect personal information about your business from these sources:

Data you give to us:

When you apply for our products and services

When you talk to us on the phone or in office

When you use our website

In emails and letters

Payment and transaction data.

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### **Key Information**

We only use your personal data for the purpose for which you provided it. We only share select data with external parties where it is necessary for us to do so if we are required to do so by law.

You can always get in touch to ask us what personal data we hold and to correct and update your data if anything changes or discuss any further queries you may have regarding your privacy rights. Details of how to do so are listed in this policy.

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### **How the law protects our customers**

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside of LFS. The law says we must have one or more of these reasons:

To fulfil a contract we have with our customer, or

When it is our legal duty, or

When it is in our legitimate interest, or

When a customer consents to it.

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A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so and what our legitimate interests are:

- To run our business in an efficient and proper way to fulfil our legal and contractual duties
- To manage our relationship with your business to develop our services and keep records up to date
- To provide advice or guidance about our products and services to be efficient in our role.
- To respond to queries and complaints and seek to resolve them to improve our business relationship.

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### Groups of Personal Information

We use many different kinds of personal information, and group them together like this:

Type of personal information	Description
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Financial	Your financial position, status and history.
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Contact	Your business address and how to contact you.
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Transactional	Details about payments to your account with us.
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Contractual	Details about the products or services we provide to you.
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Communications	What we learn about you from letters, emails, and our conversations.
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Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
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Special types of data	The law and other regulations treat some types of personal information as special. We don't EVER need to collect and use these types of data, even if the law allows us to do so:
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	Racial or ethnic origin
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	Religious or philosophical beliefs
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	Trade union membership
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	Genetic and bio-metric data
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	Health data including gender
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	Criminal convictions and offences
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Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, whether you get paper or email invoices and statements.
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### Who we share your personal information with:

We never share any personal information with any other company.

All customer information stays within our business. No transfers take place and we do not have other departments or offices located elsewhere.

We will only share customer information when required to do so in a legal capacity.

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### **Opening accounts**

When you open a credit account with us, we may check that you or your business meets the conditions needed to open the account. This may include checking financial position.

### **Approving credit**

We use a system to decide whether to allow your business to apply for credit. This is called credit scoring. It uses past data to assess how likely you are to pay invoices. This includes data about similar accounts you may have had before.

Credit scoring uses data from these sources:

Your application form & references

Data we may already hold

Information found freely on the internet

This gives us an overall assessment based on this and allows us to make responsible credit acceptance decisions that are fair and informed. We do not use Credit Reference Agencies for credit & identity checks. Credit scoring methods are reviewed regularly to make sure they are fair and unbiased.

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### **Data transfers or sharing out of the EEA**

Lindum Fire Services have no need to and will never share information to any other entity unless legally obliged including to countries outside the European Economic Area ('EEA').

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### **Cookies**

Visitors to the LFS website should be aware that information and data may be automatically collected by our website through the use of "cookies." These are small text files that a website can use to recognise repeat visitors and facilitate the visitor's ongoing access to and use of the site. They allow us to monitor usage behaviour and compile aggregate data that will help us to make improvements to our website.

Cookies are not programs that will enter a visitor's computer system and damage files. Generally, cookies work by assigning a unique number to the visitor that has no meaning outside the assigning site. If a visitor does not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the visitor to deny or accept the cookie feature. However, you may lose some features and functionality if you choose to disable cookies.

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### **Marketing**

Using your personal information to tell you about relevant products and offers is what is meant when we talk about 'marketing'. The personal information we have for you is made up of what you tell us and data we collect when you use our services.

Lindum Fire Services Ltd do not use your personal details for marketing purposes. We will only ever email you regarding invoices/statements, service bookings or in response to your email communications.

If you change your mind about receiving email invoices and statements you can update your choices at any time by contacting us.

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### **How long we keep your personal information**

We will keep your personal information for as long as you are a customer of Lindum Fire Services Ltd. After you stop being a customer, your account will be closed. We may keep your data for up to 6 years plus the current year for one of these reasons:

- To respond to any queries or complaints.
  - To show that we treated you fairly.
  - To maintain records according to rules that apply to us.
  - To comply with legal responsibilities.
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### **Data Cleansing & Storage**

Lindum Fire Services Ltd periodically cleanse and validate each and every record, ridding our database of old, invalid records and to check whether details are still required or to be removed. All Customers data will be stored within the European Economic Area (“EEA”). We will take all steps reasonably necessary to ensure that Customers data is treated securely and in accordance with this GDPR regulations.

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### **Our Employees**

Lindum Fire Services Ltd ensures that all of our employees, whether temporary or permanent are informed of the confidential nature of any Personal Data we hold and are bound by confidentiality obligations and usage restrictions in respect of the Personal Data we hold.

All employees undertake training on Data Protection Legislation relating to handling and security of Personal Data and how it applies to their particular duties.

We will take all reasonable steps to ensure the reliability, integrity and trustworthiness of all of our employees with access to the Personal Data.

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### **Subject Access Requests**

You have the right to access your data or question any information we have about you that you think is wrong or incomplete. If you want us to stop using or amend your personal information In line with your rights, anyone who wishes to make a formal Subject Access Request to QA for the purposes of requesting personal data or taking some action with respect to the personal data that is held about them should submit the request in writing by post or email to the address given in this policy.

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the ‘right to object’ and ‘right to erasure’, or the ‘right to be forgotten’.

There may be legal or other official reasons why we need to keep or use your data. But please contact us if you think that we should not be using it.

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### **How to withdraw your consent**

You can withdraw your consent to our use of your data at any time. Please contact us if you want to do so. If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

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All employees undertake training on Data Protection Legislation relating to handling and security of Personal Data and how it applies to their particular duties.

We will take all reasonable steps to ensure the reliability, integrity and trustworthiness of all of our employees with access to the Personal Data.

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### **How to complain or request a copy of your personal information**

You can request access to your personal information we hold or to let us know if you are unhappy with how we have used your personal information by emailing or by writing to us:

info@lindumfire.co.uk

Data Controller  
Lindum Fire Services Ltd  
7 Newporte Business Park  
Cardinal Close  
Lincoln  
LN2 4SY

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern.

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