

# **Privacy Policy**

This notice explains when and why we collect personal information about you; how we use it, the conditions under which we may disclose it to others and how we keep it secure.

This notice does not apply to any websites that may have a link to ours.

### Who we are

Data is collected, processed and stored by T W Barber Ltd and we are what is known as the 'data controller' of the personal information you provide to us.

T W Barber Ltd is a registered company, number 06863821

T W Barber Ltd is registered with the Information Commissioner's Office (ICO) under registration reference ZA099765

# The data we collect about you

Personal data or personal information means any information about an individual that can identify that person.

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

Identity Data – includes first name, last name, marital status.

Contact Data – includes address, email address and telephone numbers.

We do not collect any Special category data. This can include more sensitive information and may include racial or ethnic origin, religion, health or criminal convictions.

In the majority of cases personal data will be restricted to basic information. In some cases we may need to complete ID checks.

We do not knowingly collect any data about children.



## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract and you fail to provide that data when requested, we may not be able to carry out any work. In this case we may have to cancel a product or service you have with us but we will notify you at the time if this is the case.

## How is your personal data collected?

We use different methods to collect such as:

Direct interactions – You may give us your identity and contact details by filling in forms or by corresponding with us by post, phone, email, in person or otherwise.

Third Party sources – We may receive personal data about you from various third parties such as organisations that have referred work to us.

# Why we need your personal data

The primary reason for asking you to provide us with your personal data is to allow us to communicate with you and to carry out our work to your property.

Generally, we do not rely on consent as a legal basis for processing your personal data and at present we do not send any marketing communications.

Purposes for which we will use your personal data

The lawful basis for our processing of your personal data is set out below:

# Identity and Contact Data will be used on the following basis:

To register you as a client and collect your mandate and if applicable excess payment which enables us to deliver the services we are engaged to provide to you.

To administer and protect our business which is necessary for our legitimate interests and in order to comply with our legal obligations.

Disclosures of your personal data with sub-contractors or specialists who are engaged by us to assist in delivering services to you.



We may share data with other organisations including, the FCA, insurers and solicitors and counterparties to any transaction.

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.

#### International transfers

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

### How we protect your personal data

We recognise that your information is valuable and we take all reasonable measures to protect it whilst it is in our care.

We have exceptional standards of technology and operational security in order to protect personally identifiable data from loss, misuse, alteration or destruction. Similarly, we adopt a high threshold when it comes to confidentiality obligations and both internal and external parties have agreed to protect confidentiality of all information and to ensure all personal data is handled and processed in line with our stringent confidentiality and data protection policies.

We use computer safeguards such as firewalls and data encryption and annual penetration testing; and we enforce, where possible, physical access controls to our buildings and files to keep data safe.

# How long will we keep it for

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

# Subject access requests

Under the DPA, enhanced under GDPR, you are entitled to request a copy of your personal data (otherwise known as a subject access request). If you wish to make a request, please do so by email addressed to <a href="mailto:admin@twbarber.co.uk">admin@twbarber.co.uk</a> or contact the person dealing with your matter.

A request for access to your personal data means you are entitled to a copy of the data we hold on you – such as your name, address, contact details, date of birth, information regarding your health etc.



We are obliged to respond to any reasonable request within one month of the request being received by us. If we consider a request to be unfounded or excessive, we reserve the right to refuse the request or charge a fee for complying with it. In such a case, you have the right to lodge a complaint with the ICO.

### 11. Complaints about the use of personal data

If you wish to raise a complaint on how we have handled your personal data, please contact us and we will investigate further. You can contact us at <a href="mailto:admin@twbarber.co.uk">admin@twbarber.co.uk</a>

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the ICO.

## **Marketing data**

We may contact you for the purpose of direct marketing. This means that we may use your personal data that we have collected in accordance with this privacy policy to contact you about our products or services, events etc. which we feel may interest you. The direct marketing communications may be provided to you by social media channels, email or post. We will never send marketing communications via SMS or call you without your specific consent; nor do we ever pass on or sell your details to a third party. At present we do not undertake any direct marketing.

# How we collect personal data

Apart from formally instructing us, the following are examples, although not exhaustive, of how we may collect your personal information now or in the future:

- Sign-up to receive one of our newsletters
- Submitting an online enquiry
- Following/liking/subscribing to our social media channels
- Agree to fill in a questionnaire or survey on our website
- Ask us a question or submit any queries or concerns you have via email or on social media channels
- Post information to our website or social media channels, for example when we offer the option for you to comment on, or join, discussions
- When you leave a review about us on an internet review site

Whenever we collect your personal data, you may be provided the opportunity to opt-in to receiving marketing communications from us.



## How we may use your details

The following are examples, although not exhaustive, of how we may use your personal information for our legitimate business interests:

- fraud prevention
- conflict of interest searches
- direct marketing
- network and information systems security
- data /analytics /enhancing, modifying or improving our services
- identifying usage trends
- determining the effectiveness of promotional campaigns and advertising.

We may use your personal information for legitimate interests such as direct marketing or to provide you with information you would expect to receive or that would benefit and enhance our relationship. This information will help us review and improve our products, services and offers.

### **Your rights**

You have a number of legal rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below.

### These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which we hold about you.
- Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information.
- Requesting that we correct your personal information if it is inaccurate or incomplete.
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it.
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.
- In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.



• Lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us. You can do this by writing to us at <a href="mailto:admin@twbarber.co.uk">admin@twbarber.co.uk</a>

### 17. Your consent

By continuing to use this website you confirm that you give consent to T W Barber Ltd to carry out all processing activities carried out for the same purpose or purposes as set out above. You confirm that this consent is freely given, specific, informed and unambiguous.