



CLEANCOMPLETE

understanding your time is precious

Data Protection Policy

Last updated

July 2026

1. Our commitment

Clean Complete UK Limited is committed to handling personal information lawfully, fairly, transparently and securely. This Data Protection Policy explains the standards we apply when handling client, representative, staff, contractor and business-contact information.

2. Data protection principles

We aim to process personal information lawfully, fairly and transparently; collect it for specified and legitimate purposes; keep it adequate, relevant and limited to what is necessary; keep it accurate where reasonably required; retain it no longer than necessary; and protect it using appropriate security. We maintain responsibility for demonstrating our approach to data protection.

3. Responsibility

The Director has overall responsibility for data protection within Clean Complete UK Limited. Employees, cleaners, contractors and authorised users of company systems must protect personal information, use it only for authorised work and report suspected incidents promptly.

4. Lawful processing

Before personal information is used, we identify an appropriate lawful basis. Contract commonly applies to quotations, bookings and service delivery. Legal obligation may apply to tax, accounting, employment or regulatory records. Legitimate interests may apply to proportionate business administration, service evidence, security, complaint handling and legal claims. Consent is used where a genuine optional choice is appropriate. We do not assume that consent is always the correct lawful basis.

5. Special category data

Health information and other special category data receive additional protection. We minimise collection and prefer practical service instructions over unnecessary medical detail. Where special category information is intentionally recorded or used, we identify an Article 6 lawful basis and an applicable Article 9 condition, document the reason where appropriate and restrict access.

6. Data minimisation and photographs

We collect only information reasonably necessary for the relevant purpose. Staff should avoid photographing people, personal documents, medication labels, screens, family photographs or correspondence unless genuinely necessary and lawful. Property-record photographs must have a defined service, condition, complaint or legal-record purpose. Marketing use is handled separately and consent is obtained where consent is the basis relied upon.

7. Access and security

Access to personal information is limited to people who need it for their role. Devices and accounts used for business information should use screen locks and strong passwords, and multi-factor authentication should be enabled on key systems where available. Passwords must not be shared. Lost or stolen devices with business access must be reported immediately.

8. Keys, codes and property access information

Keys, alarm codes and property access instructions are sensitive operational information. They must be accessible only to authorised people and shared only where necessary for the service. Keys should not be labelled with a full client address. Codes and access instructions should be deleted or updated when no longer required.

9. Sharing and service providers

Personal information is shared only where there is a clear business or legal reason. We consider the information involved, the recipient, security and the purpose before sharing. Where a supplier processes personal information for us, we consider appropriate contractual and data protection arrangements.

10. Retention and secure deletion

We review information and delete or securely dispose of it when its purpose and retention justification have ended. Unsuccessful enquiries are normally reviewed after 12 months. Core client contracts, quotations, invoices and relevant service records may normally be retained for up to 7 years where required for tax, accounting or legal purposes. Access codes should be deleted promptly when access ends. Photographs should be reviewed and deleted when no longer needed.

11. Individual rights requests

Requests concerning access, correction, deletion, restriction, objection, portability or withdrawal of consent must be passed promptly to the Director. Requests do not need to use legal wording. We record the date received, verify identity proportionately where necessary, identify the applicable deadline, search relevant systems and document the response.

12. Personal data breach procedure

A suspected personal data breach must be reported to the Director immediately. We record what happened, contain the incident, preserve relevant evidence, assess the likely risk to people and document our decision. We keep a record of personal data breaches. Where a breach is reportable to the ICO, we will notify without undue delay and, where feasible, within 72 hours of becoming aware of it. Affected individuals will be informed where the legal threshold requires this.

13. Data protection by design

We consider privacy when introducing new services, forms, apps, systems, cameras or materially new uses of personal information. We aim to collect the minimum necessary information, set suitable access and retention controls and consider whether a Data Protection Impact Assessment is required for processing likely to result in high risk.

14. Staff and contractor expectations

Anyone handling Clean Complete information must maintain confidentiality, protect devices and paperwork, avoid discussing clients in public, avoid unnecessary photographs, follow secure disposal arrangements and report mistakes or suspected breaches immediately. Client information must not be used for personal purposes.

15. Direct marketing

Before sending electronic marketing, we consider applicable data protection and electronic communications rules. Marketing preferences, objections and unsubscribe requests are actioned promptly. We may retain limited suppression information where necessary to avoid contacting a person again.

16. Review and compliance

We review this policy, our privacy information, key service providers, retention practices and breach records periodically and when material changes occur. We also review whether Clean Complete UK Limited is required to pay the ICO data protection fee and keep any required registration current.

17. Contact

Questions about data protection can be sent to info@cleancompleteuk.com or by post to Clean Complete UK Limited, 167–169 Great Portland Street, 5th Floor, London, England, W1W 5PF.