

Data Protection Policy

Steven J Covill Flooring Ltd

Last updated	21 st May 2018
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Definitions

Company	means Steven J Covill Flooring Ltd, a registered company. Including our affiliates trading as “SJC Flooring”, “Mobile Carpets & Flooring” & “Splash Hot tub hire”
GDPR	means the General Data Protection Regulation.
Responsible Person	means Jessica Covill, designated DPO. Contact: J Covill, 19 Rockwood Road, Plymouth, PL6 7SE. E:hello@mobilecarpetsandflooring.com
Register of Systems	means a register of all systems or contexts in which personal data is processed by the company.

1. Data protection principles

Steven J Covill Flooring Ltd take your privacy very seriously. We have updated our privacy policy in line with the guidelines of the ICO and we are committed to processing data in accordance with our responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the company.
- b. The Responsible Person shall take responsibility for the company's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The company shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the company shall maintain a Register of Systems.
- b. We collect and process your personal data to enable us to provide a great customer experience and to enable us to complete the job in hand. Data that we may collect includes;
 - Name
 - Address
 - Email address
 - Contact telephone number
 - Financial details
 - Other data that could directly or indirectly identify you.
- c. The Register of Systems shall be reviewed at least annually.
- d. Individuals have the right to access their personal data and any such requests made to the company shall be dealt with in a timely manner.
- e. **Third-party websites.** Our website and our mobile applications contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites. Please read the privacy policy of any website you visit.

4. Lawful purposes

- a. All data processed by the company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The company shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the company's systems.
- e. We use your data for:
 - Providing you goods
 - Providing you services
 - Communicating with you via email or telephone
 - Customer relationship management

5. Data minimisation

- a. The company shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The company will only collect relevant data, in order to process customer orders and to ensure communication with the customer regarding their order.
- c. We only share your personal data as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from utilizing, sharing or retaining your personal data for any purpose other than as they have been specifically contracted for (or without your consent).

6. Accuracy

- a. The company shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the company shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archive of personal data will be kept for no more than 14 months. It will be kept so that the company can contact customers about their order and to answer any follow up care questions, remedy issues and to inform customers of special offers that may be relevant to them.
- c. You may request removal of your data from our records at any time. You may opt out of any communication by notifying the company that you no longer wish to receive communication from the company.

8. Age restrictions.

Our Services are available for purchase only for those over the age of 18. Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any personal data, please contact us.

9. Security

- a. The company shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

10. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the company shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY