

PRIVACY POLICY

PLEASE READ CAREFULLY, IF YOU DO NOT ACCEPT THESE TERMS, YOU ARE ADVISED NOT TO USE THE WEBSITE

This policy was last updated: 21st May 2018

Use of this website, <u>www.southlondonheating.co.uk</u>, constitutes your legal agreement to the terms within this policy and your acceptance of this policy is deemed to occur upon your first use of the website.

South London Heating may change this policy from time to time by updating this page. You should check this page before using the website to ensure that you are aware of and accept any changes.

Policy Statement

South London Heating understands that your privacy is important to you and that you care about how your personal data is used and shared online. This privacy policy sets out how South London Heating collects and processes your personal data.

We will take all reasonable steps to ensure that personal information is safeguarded and kept in accordance with the law.

By providing us with your data, you warrant that you are over 13 years of age.

About Us

South London Heating is registered in England and Wales under Company Registration Number 06408521. Our registered office address is 5 Mosslea Court, 63-65 High St, London, SE20 7AL. We are registered with the Information Commissioner's Office (ICO) for data protection and our registration number is ZA142204.

Where we manage personal data, we identify as a Data Controller and recognise and act on our obligations under applicable data protection laws. For any issues relating to data protection the person responsible is Mark Gallagher.

What personal data do we collect?

Information that you provide to us is retained and processed in accordance with UK data protection legislation. This includes data given to us from the following:

Contact: We have a Contact Us Form and this is used to collect your name and email address as well as your message, so that we can contact you and provide details of our services to you, make bookings, confirm bookings and deal with general company enquiries. Data is held on the grounds of being legitimate to our business interests and where we have a contractual agreement with you.

Cookies: We may ask for your consent to cookies to be placed on your device when you land on our pages. These may log your Internet Protocol (IP) address, and the type of web browser used. Data is only processed on the basis of valid consent obtained from you. See below for details of our Cookie Policy.

Emails: We retain copies of emails sent to us on our servers. Your personal information will be held by us in accordance with this Privacy Policy and will be on the basis of being legitimate to our business interests or where we have a contractual agreement with you.

Online bookings and quotes: We will ask for your name, email, telephone number and address in order to provide you with a quotation for services that we carry out. Your personal data is required in order for us to communicate with you about the quote and our services. This data is held on the basis of being legitimate to our business. Data will only be retained for the provision of services and as legally required. See Data Retention below.

Phone calls: Phone calls to us may be recorded and any data relating to the call may be retained by us. The data will be held on the basis of being for our legitimate business needs or in order to fulfil our contractual obligations if you are a client of ours.

Social media: We use social media to engage with users and link to our pages on Facebook, Twitter, Google+, YouTube and LinkedIn. We do not keep any specific data that identifies you as an individual user, but hold details of our followers on these platforms. You should refer to the Privacy Policies of these channels to understand how they treat your data in relation to linking to our site.

Facebook: https://www.facebook.com/privacy/explanation

Twitter: https://www.twitter.com/en/privacy Google+: https://policies.google.com/privacy

YouTube: https://www.youtube.com/intl/en-GB/yt/about/policies/#community-guidelines

LinkedIn: www.linkedin.com/legal/privacy-policy

If you send us a direct message via social media, the details may be retained by us only as relevant to any ongoing contract or to further our legitimate business interests or as required for legal purposes. The third party provider may also retain details in accordance with their Privacy Policy.

Reviews: We may publish reviews and comments made by customers in relation to our services, on our website or social media pages. Your full name and company may be used. Data is only published on the basis of valid consent obtained from you.

Special categories of data

We do not process personal data which is considered to be sensitive.

Children

We do not market this website at those under 18 years old. Consistent with the GDPR we will never knowingly request personally identifiable information from anyone under the age of 16 years old.

We will take appropriate steps to delete any personal data of individuals less than 16 years of age that has been collected on our website upon learning of the existence of such data.

Information we get from other sources

From time to time, we may need to obtain information from third parties about you. This will only apply where it is necessary to provide our services and as permitted by law.

How do we use your data?

We may use the information we collect from you in the following ways:

- To administer and improve the website;
- To personalise the content and your experience of the website;
- To allow us to respond to communications sent to us;
- To administer site features;
- To send you email notifications which you have specifically requested;

- To send to you marketing communications, where expressly agreed;
- To provide third parties with statistical information about our users;
- To ask for reviews or testimonials;
- To deal with enquiries and complaints made by or about you relating to the website.

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. All personal data is kept private and stored securely until a time it is no longer required or has no use.

Sharing Information

Disclosure

We don't share, sell, or distribute your data to third parties, except as contractually agreed with you or as provided in this Privacy Policy. We may disclose your personal information if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend our legal rights, or if otherwise legally permitted.

Data Processors

We may use Data Processors who act on our instruction in relation to the management of your data and they must adhere to all data protection laws and regulations. We will ensure that any Data Processors used only operate on our written instructions and comply with their obligations under the GDPR. You will be informed of any other Data Controllers who have access to your data and who may determine processing activities separately to us, or as a Joint Data Controller.

Marketing

We will only send you emails about our services, i.e. direct marketing, with your express consent. You have the option not to give consent and to withdraw consent at any time. You may withdraw your consent for us to contact you by contacting us at info@southlondonheating.co.uk Non-personally identifiable visitor information may be provided to third parties for marketing, advertising or other uses.

External links

Users of the website are advised to adopt a policy of caution before clicking on any external web links. Clicking an external link will take the user away from our website. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. South London Heating and its owners cannot be held liable for any damages, or the consequences of visiting any external links.

Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

South London Heating uses social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised that before using such social sharing buttons, that they do so at their own discretion, and should consider that the social media platform may track and save requests to share a web page, through the users' social media platform account.

Payment processing

We process customer payments by Worldpay. All payment details and sensitive information you supply are encrypted via Secure Socket Layer (SSL) technology. Transactions processed through a gateway provider are not stored or processed on our servers.

You may be asked by the provider for details of your name, email address, mailing address, phone number and credit / debit card information. You are advised to refer to their Privacy Policy to understand how they process personal data.

Data Retention

We keep your personal information in accordance with our Data Retention Policy which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations. The need to hold information is regularly reviewed and data will be disposed of when no longer required.

Data Security

Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

We take appropriate steps to ensure a safe processing of personal data, however, we cannot guarantee the security of data transmitted through our website or by email. Any transmission is at your own risk.

Data Storage

Our website is hosted by LCN.com Any information that you supply to us may be stored and processed by our servers located in the U.K. Your data may be transferred in accordance with the relevant data protection laws.

Rights of Data Subjects

South London Heating recognises a data subjects rights and will uphold these in accordance with data protection laws. You are entitled to see the information held about you and you may ask us about any of the following:

Subject access requests

Data subjects (i.e. individuals) have the right to access personal data that is held by submitting a subject access request (SAR) to South London Heating. We will endeavour to respond quickly to any such requests, which legally require us to respond within one month of receiving the request and necessary information. A subject access request can be made by emailing us info@southlondonheating.co.uk

Right to rectification

Data subjects have the right to request that we amend or change personal information that is inaccurate or incorrect.

Right to erasure

Data subjects have the right to ask us to delete personal information from our systems without giving any reason and at any time. We will act on any such request without delay.

Right to restrict processing

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

- Personal data is not accurate;
- The processing of data is unlawful data subjects may request that processing is restricted;
- Data is required to exercise legal rights or defend legal claims;
- Data is unlawful but there may be lawful grounds for processing, which override this right.

Right to data portability

Data subjects have the right to obtain and request the transfer of their data to different service providers.

Right to object

Data subjects have the right to object to the processing of data at any time based on their particular situation. This includes objecting to profiling unless it is in the 'public interest' or exercised lawfully by an official authority. We will only process data under lawful grounds.

Right not to be subject to decisions based on automated processing

We do not use any automated processing that results in any automated decision based on a data subject's personal information.

Using your rights

If you wish to invoke any of these rights, you should contact the person responsible for data protection by emailing us at info@southlondonheating.co.uk

Data Breaches

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that there is an actual, or possibility, that data within our control including the control of our data processors, has been compromised. If the breach is classified as 'high risk' we will notify all data subjects concerned using an appropriate means of communication. We will report any relevant breaches to the ICO, see below.

COOKIES POLICY

What are Cookies

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the user with a tailored experience when navigating the website. Session cookies may be used to validate your access to different parts of the website.

Disabling Cookies

If you are uncomfortable with the use of cookies, you can disable cookies on your device by changing the settings in the preferences or options menu in your browser. You can set your browser to reject or block cookies or to tell you when a website tries to put a cookie on your device. You can also delete any cookies that are already stored on your device. However, please be aware that if you do delete and block all cookies from our website, parts of the site my not fully function.

How we use Cookies

The South London Heating website uses cookies and widgets to help us identify and track visitors, their usage of the website, and their website access preferences. Cookies are a user's identification card for our servers. A widget is a stand-alone application that can be embedded into third party sites by any user on a page where they have rights of authorship (we use this to show video through YouTube).

Our cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their device. This complies with UK legislation which requires that explicit consent is given by users before reading files are left, or applied, on a user's computer or device.

To the extent that cookies data constitutes personally identifiable information, we process such data on the basis of your consent.

Types of Cookies

The types of Cookies we use are:

 Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

- Statistics cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- Marketing cookies are used to track visitors across websites. The intention is to display ads
 that are relevant and engaging for the individual user and thereby more valuable for publishers
 and third party advertisers.
- Some cookies may be unclassified.

Cookies can be placed for a user's session or will be persistent. See below table.

Cookies we use

The Cookies we use are shown in this table below.

COOKIE	PROVIDER	TYPE	USE	RETENTION PERIOD		
NECESSARY						
cfduid	embed.ly	HTTP	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year		
cfduid	embed.ly	НТТР	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year		
cfduid	freegeoip.net	НТТР	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year		
STATISTICS	STATISTICS					
_ga	embed.ly	HTTP	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years		
_ga	southlondonheating.c o.uk	НТТР	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years		
_gat	southlondonheating.c o.uk	HTTP	Used by Google Analytics to throttle request rate.	Session		

_gid	embed.ly	НТТР	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Session
_gid	southlondonheating.c o.uk	HTTP	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Session
MARKETING		•		
collect	google-analytics.com	Pixel	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session
em_beagle_eid	embed.ly	HTTP	Unclassified	20 years
em_cdn_uid	southlondonheating.c o.uk	HTTP	Unclassified	1 year
em_p_uid	southlondonheating.c o.uk	HTTP	Unclassified	1 year
GPS	youtube.com	HTTP	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.	Session
VISITOR_INFO1_LI VE	youtube.com	HTTP	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	179 days
YSC	youtube.com	HTTP	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
UNCLASSIFIED				

southlondonheating.c o.uk	HTTP	Updates news, offers and events from the website.	335739 days
southlondonheating.c o.uk	HTTP	Updates news, offers and events from the website.	335739 days
southlondonheating.c o.uk	HTTP	Updates news, offers and events from the website.	335739 days
southlondonheating.c o.uk	HTTP	Updates news, offers and events from the website.	335739 days
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mfn-post-love- 3530	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3536	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3568	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3643	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3683	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3688	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3709	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3724	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3731	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
mfn-post-love- 3740	southlondonheating.c o.uk	НТТР	Updates news, offers and events from the website.	335739 days
tq_cookies	truequote.co.uk	НТТР	Updates news, offers and events from the website.	Session

Analytics

South London Heating uses tracking software provided by Google Analytics to monitor its visitors, and to better understand how they use the site. See above table. The software will save a cookie to the user's hard drive in order to track and monitor engagement and usage of the website. The

cookie will not store, save or collect personal data. The data collected is only viewable by selected employees on a need-to-know basis and by Google.

Google's privacy policy is available at http://www.google.com/privacy.html. Users may opt-out from having their data collected by disabling the tracking.

Consent to Cookies

If you accept the use of Cookies on this website, you consent to the processing of data about you by us and any third parties as identified above in accordance with this policy and our Privacy Policy. You have the right to withdraw your consent at any time by emailing us at info@southlondonheating.co.uk

Further information

Guidelines for the processing and handling of data and use of Cookies is available from the Information Commissioner's Office, the UK supervisory authority on data protection, see ico.org.uk.

Information is also available at www.ec.europa.eu/ipg/basics/legal/cookies/index en.html.

Important Information

Questions and queries

If you have any concerns about how we handle your data, you can contact the Data Controller by email to info@southlondonheating.co.uk

Changes to this policy

We reserve the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website.

You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

Complaints

If you want to raise a concern about the use of your data, you can contact us by email to info@southlondonheating.co.uk. Alternatively, you can formally raise a concern or complaint to the Information Commissioner's Office (ICO) directly on 0303 123 1113, or see the options for reporting issues on https://ico.org.uk/concerns/

No Waiver

No failure or delay by us in exercising any of our rights in accordance with this Privacy Policy or our terms and conditions shall be deemed to be a waiver of that right, and no waiver of a breach of any provision of the Agreement shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

Severance

If one or more of the provisions of this Privacy Policy or our terms and conditions is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of these terms and conditions and shall remain enforceable.

Third Party Rights

The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

Jurisdiction and Governing Law

The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and each party submits to the exclusive jurisdiction of the English courts.

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