

# **Privacy Policy**

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Privacy Policy		1	
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### **Privacy Statement Summary:**

This Privacy Policy ("Policy") explains how your information is collected, used and disclosed by The Conservatory Insulation Company ( "We" or "Us" or "our"). This policy applies where we are acting as a Data Controller, where we determine the purposes and means of the processing of that personal data, for example with respect to the personal data of our website visitors, service users, clients, partners etc.

Who will use my data?	The Conservatory Insulation Company
Who we are?	The Conservatory Insulation Company specializes in providing insulation solutions for conservatories in homes and commercial buildings in the UK. The company offers a range of insulation products and services designed to improve the energy efficiency of conservatories and reduce heat loss.
	Some of the insulation products and services offered by the company include multi-foil insulation, insulated conservatory roofs, and insulated ceiling panels. The company also offers a range of other services such as conservatory cleaning and maintenance.
	Overall, the Conservatory Insulation Company aims to help homeowners and businesses save money on their energy bills by providing effective insulation solutions that can help to reduce energy consumption and improve the overall energy efficiency of their buildings.
What for?	We will store and process your data in order to allow us to provide our products and services. We also process data to manage our relationships with clients and to provide them with relevant information and updates about our services.
	Additionally, we may process data for administrative and operational purposes, such as managing our website, communicating with individuals who have contacted us, and complying with legal or regulatory requirements. We take data privacy and security seriously and ensure that all data we process is done so in accordance with applicable laws and regulations. We always strive to be transparent about our data processing practices and to provide individuals with clear information about their rights in relation to their

Privacy Policy	2	
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personal data. If you contact us, we may also send you information that we think you will be interested in. This may include a range of related products and services. We will also send any relevant details to authorities and any other organisation that requires them by law. What will happen if I If you contact us, we will do our best to assist you with any questions, concerns, or issues you may have. Our team of contact vou? dedicated customer support professionals is available to help you with any aspect of our platform, from account setup and management to technical support troubleshooting. When you reach out to us, we will do our best to provide a prompt and helpful response. Our goal is to ensure that you have a positive experience using our website, and we are committed to providing you with the highest level of customer service. So, whether you need help with a specific feature or have a general question about our services, don't hesitate to contact us. We are here to help you get the most out of services and achieve your goals online. If you contact us, we will process the information you provide in order to respond to your inquiry or fulfill your request. This may include using your information to communicate with you, troubleshoot problems, and improve our services. We may also use your information to personalize your experience and to improve the functionality of our services. We may also use your information to send you marketing or promotional materials, but only if you have opted-in to receive such communications. We will also use your information to protect against, identify, and prevent fraud and other illegal activity, claims and other liabilities, and as otherwise required by law. We may also share your information with our affiliates and partners, but

only as necessary to provide you with the requested services or as required by law. We will also take appropriate measures to ensure that your information is kept secure and protected.

What data will be

We collect and store only a limited amount of data - we

Privacy Policy	3	
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stored?	
storeu:	collect only the data we require to manage our relationship with you, to provide our services to our clients, and to run and develop our company.
	We store various types of data to provide our users with a high-quality service and to improve our platform. Here are some of the types of data we store:
	- Log in information: When you log in, we store the information you provide to us, such as your name, email address, and other contact information.
	<ul> <li>Link data: We store the links you add to your HOOUU.COM, including the URLs, titles, descriptions, and any associated media.</li> </ul>
	- Analytics data: We store information related to your use of our platform, such as the pages you visit, the links you click, and the features you use. This information helps us to understand how you interact with our platform and to improve your user experience.
	- Financial information: information about payments made between us and you as a client.
	Device and browser information: We store information about the devices and browsers you use to access our platform, such as your device type, operating system, and browser version
What data will be shared?	We will not share your data with any third parties other than as described here, to fulfil our obligations to you, operate and develop our company, and to protect our interests. We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We may share your information with regulators or legal bodies that request it.
How long?	Your data will be stored only for as long as strictly necessary to provide our services to you. For more information please refer to our Data Retention Policy.
Who can access my data?	We will never sell, share or otherwise distribute your data to any other third party other than as described here. Access to your data is carefully controlled.
	We will share your information with any regulator or legal

Privacy Policy	4	
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	body that requests it, as well as any parties relevant to the application process.
	We ensure access is restricted to only those persons authorised by us to access your data.
	Access to your data is strictly controlled. For more information, please contact us about our Information Security Policy.
How is my data kept secure?	We will store your data on secure servers. We use industry standard security protocols/technology to secure your data.

## **About This Privacy Policy**

This policy sets out how we will collect, store and process the information that you provide to us, information we collect as a result of our interaction, the information we collect about you from other sources, or information we service about you by using the information we hold.

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process, and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant, and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the UK, unless that country or territory

Privacy Policy	5	
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also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other risks inherent in the collection, storage, or processing of your data

#### Who We Are And How To Contact Us

The Conservatory Insulation Company is registered in the UK and is registered with the Information Commissioner's Office. The Data Protection Lead is James Murray. You can contact us in any of the following ways:

Name of Data Protection Lead: James Murray

Company name: The Conservatory Insulation Company

Email: info@theconservatoryinsulationcompany

Data Protection Lead Address: Grangefield mill, Grangefield road, Leeds,

LS28 6JT

Data Protection Lead Number: 08009991931

#### Who this privacy policy applies to

This policy relates to data subjects of The Conservatory Insulation Company including clients, customers, suppliers, partners, employees, and all other individuals. Processing of your data is required in order to offer you our

Privacy Policy	6	
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products and services and to run our company. It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Contact details
- Postal addresses
- Email Addresses
- Telephone numbers
- And other information as required

### What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Information we collect as a result of our interaction,
- The information we collect about you from other sources,
- or information we service about you by using the information we hold.

We do not routinely collect or process sensitive data about you. However, where this is the case we will ensure we take appropriate precautions to protect your data.

Privacy Policy	7	
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# How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact	(a)Performance of a contract with you (b) Consent
To process and deliver the products and services you request including digital signages, and to manage payments, fees and charges.	<ul><li>(a) Identity,</li><li>(b) Contact,</li><li>(c) Financial,</li><li>(d) Transaction,</li><li>(e) Marketing and</li><li>Communications</li></ul>	<ul><li>(a) Performance of a contract with you,</li><li>(b) Necessary for our legitimate interests to recover debts owed to us</li><li>(b) Consent</li></ul>
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services or privacy policy, to maintain our records	<ul><li>(a) Identity,</li><li>(b) Contact,</li><li>(c) Profile,</li><li>(d) Marketing and</li><li>Communications</li></ul>	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our services (d) Consent
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation (c) Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	(a)Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to

Privacy Policy		8	
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		develop our business and to inform our marketing strategy (b) Consent
To make suggestions	(a) Identity,	(a)Necessary for our
and recommendations	(b) Contact,	legitimate interests to
to you about services	(c) Technical,	develop our services and
that may be of interest	(d) Usage, (e)	grow our business
to you	Profile	(b) Consent

We may collect and process information about you, including your name, address, contact details (including email address and mobile phone number). We may take personal information from a range of sources.

We will use your data for the purpose it was collected and where we have your consent or an appropriate lawful basis may use your personal information to provide you with marketing information about services, promotions and offers that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any services we provide to you.

You will only receive marketing communications from us if you have:

- Requested information from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing
- Where we have an appropriate lawful basis

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

#### How to change your preferences

We operate in line with the GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal

Privacy Policy	9	
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information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities. Where possible any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to exercise your rights, make a complaint, or change your preferences at any time.

#### Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

#### How we store and process your data

Your data will be collected, stored and processed securely, where we transfer your data internationally, we will ensure we take appropriate precautions to protect this data. Your data will normally be stored for up to 7 years in order to meet our legal obligations and protect our interests.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Privacy Policy	10	
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#### **Our obligations**

We are a Data Controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Third Parties**

We may have to share your personal data with selected third parties in



order to meet our obligations to you and for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Third parties including data processors, suppliers, service providers, equipment providers, and other third parties as required to run and grow our business
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- Other technology companies providing tracking, analytics, and advertising companies
- Social media companies
- Companies in our Group of companies
- Partners and other organisations involved in the provision of our services to you and as required to operate our company
- Government organisation, regulators, other legal authorities and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Other companies as required to meet our obligations to you and run our business

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

#### Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of

Privacy Policy	12	
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confidentiality.

Where required under GDPR will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use,



including the storage of cookies on your machine.

# Contacting us, exercising your information rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: James Murray, The Conservatory Insulation Company. We aim to process data protection requests within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied, then you have the right to apply directly to your local data protection authority. You can find the list at:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index en.htm

End.

Privacy Policy	14	
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