

Terms & Conditions

Privacy & Data Protection Policy

At Snug Energy Ltd, we fully support the principles identified in the General Data Protection Regulation (GDPR) 2016/679 and accept Data Protection to be a fundamental business consideration. This extends to our international suppliers.

We are committed to safeguarding the personal data and privacy of our website visitors, clients (including their staff and contractors), students and others who have chosen to interact with us in the course of our business activities.

Please take the time to read this document carefully and don't hesitate to contact us at enquiries@snugenergy.co.uk with any general questions or queries.

Note: If you do not agree to your personal data being used in accordance with this Privacy Policy, please do not submit your personal data to us through the website or any other means. Please also refer to our Cookie Policy. You can set your browser to refuse all or some browser cookies. However, if you choose to disable or refuse cookies, some parts of our website may become inaccessible or not function properly and could affect your experience.

This Privacy Policy forms part of our Terms and Conditions of Business.

We've identified some of the frequently used terms and definitions in the table below.

Note: the examples provided throughout this document, do not include every type of information which could be directly or indirectly used to identify an individual. They are provided as examples only.

"personal data"	Name, date of birth, email address, residential address, phone number, IP address, Browser Cookies, geo-tracking data, Bank Account details etc
"sensitive personal data" or "special categories" of personal data	Ethnic or racial origin, political opinion, religious beliefs, philosophical beliefs, trade union membership, genetic and bio-metric data
"data controller"	This is Snug Energy Ltd when performing tasks directly relating to our own business operations
"data processor"	This is Snug Energy Ltd when it is performing a specific service to a client (who are the data controller) which requires data collection, analysis and/or other processing to satisfy a contractual obligation
"personal data breach"	Includes the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

Snug Energy Ltd has been identified as both a "data controller" and a "data processor" under GDPR.

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To make this Policy easier to understand and navigate, we've created the following sections:

1. Our Promise to You
2. The 6 Lawful Bases for Processing Your Data (We only need one reason to process your data)
3. Snug Energy Ltd as Data Controller – An overview of the types of personal data required, how and when collected, how used, how stored
4. Snug Energy Ltd as Data Processor – An overview of the types of personal data handled, how processed and how stored
5. Data Safeguarding and Security
6. Your Rights
7. Who is the “data controller” within SHEQ-MS and how do I contact them?
8. How to Make a Complaint
9. Disclaimer

Section 1. Our Promise to You

Snug Energy Ltd shall do its best to ensure that personal data under our control is:

- processed **lawfully, fairly** and in a **transparent** manner;
- collected for **specific, explicit** and **legitimate** purposes;
- **adequate, relevant** and **limited** to what's absolutely necessary for us to fulfil our contractual obligations;
- **accurate**, and where necessary, **kept up to date**;
- processed in accordance with the fundamental **rights of individuals**;
- protected during collection, use and storage to ensure the **security** of the personal data.

Section 2 The 6 Lawful Bases for Processing Your Data

There are 6 conditions under which we can process your data lawfully, and at least one of the following must apply:

Legal Basis Number 1: **You have given your consent** for us to process your data for one or more clearly identified reasons at the point you complete your data,

Lawful:



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Not lawful:



Lawful



NOTE: You will be able to unsubscribe to any of our emails at any time.

Legal Basis Number 2: The processing is necessary for the **performance of a contract** between us, or in the preparation of entering into a contract. We will need to pass your data onto boiler manufacturers in order to register your warranty and set you up to receive boiler service reminders.

Legal Basis Number 3: The processing is necessary for **compliance with a legal obligation** as set out in UK or EU law, and we must fulfil. One example given by the ICO in their Guidance document is "A court may require [us] to process personal data for a particular purpose". This is a basis we could use especially if we are required to collect or analyse occupational health, safety and wellbeing data as part of our independent, confidential, consultancy services.

Legal Basis Number 4: The processing is necessary to **protect your vital interests** for example, life and death. It's unlikely we'll need to use this as a basis for processing your data. It's more likely necessary in an emergency situation. That said, when offering First Aid support we may need to determine if you suffer from

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allergies or have any other medical conditions which require communication to the emergency services.

Legal Basis Number 5: Processing is necessary for the **performance of a task carried out in the public interest of in the exercise of official authority vested in the controller**. It's unlikely we'll be using this as a basis for processing your data as it doesn't really fit with what we do.

Legal Basis Number 6: Processing is necessary for the purposes of **legitimate** interests.

1. That a legitimate interest has been identified;
2. Demonstrate that the processing of data is necessary to achieve it; and
3. The processing is balanced against your interests, rights and freedoms.

It's possible we *could* use this as a legal reason, but this will be determined on a case-by-case basis.

So, in summary, we're most likely to collect and process your data for one or more of these reasons:

- ✓ after you have **consented** to us processing your data for a clearly defined purpose (or purposes),
- ✓ in the **performance of a contract** with you
- ✓ to **comply with a legal obligation** placed on us,
- ✓ *and possibly* to **protect your vital interests** in a face-to-face setting,
- ✓ *and possibly* for the purposes of **legitimate interests**

Section 3: Snug Energy Ltd as “Data Controller” – An overview of the types of personal data required, how and when collected, how used, how stored

As part of our “BOSS” (our Back-Office Support Systems) we use some computer software and specialist applications to help us deliver our products and services to you. Below is a list of what we use to collect your personal data, the type of data required, how we use it, and how we store it. You may use some of them when you interact with us, or you may only use a couple of items. We've highlighted the various providers in green.

Please also refer to our Cookie Policy. We have added cookies to our website and it's highly likely that our service providers may have too for their programs to run and for monitoring performance issues with their software.

Note: All items identified below are individually password protected, with access restricted to the Data Controller only.

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In no particular order:

Payzone – This is our payment processing application.

Typical information collected for payzone includes your title, your full name, home address, postcode, credit card details, etc. This information is collected verbally over the phone and is not stored anywhere other than using it at the time to process the transaction.

We will receive notification from payzone of your name, amount paid, and service purchased including date of purchase.

Xero – We use this as our accounting software, for producing invoices and recording financial transactions.

Googledrive – This is how we store our customer records. We store the contact information for our customers and records of services we have provided.

Section 4: Snug Energy Ltd as “Data Processor” – An overview of the types of personal data handled, how processed and how stored

We offer Gas boiler installation and servicing to our clients at Snug Energy Ltd – For the following examples, the client is deemed to be the Data Controller.

Customer Onsite Surveys

These surveys are usually completed at the customers premises by a Snug Energy Surveyor. Depending on the work required photographs may be taken for example: the existing boiler, radiators, pipework, the flue position etc. A technical survey detailing the existing central heating system and risk assessment will also be completed.

The information is used to aid the installing engineer and to refer to for the purpose of providing the customer with a quotation. This is stored in Google drive.

We then produce a report/survey documents which are also stored in Google Drive. Should the customer wish to proceed with the work the information is shared with the installing engineer and office team.

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Section 5: Data Safeguarding and Security

The safety and security of your personal data in all of its various forms is important to us. We have never, and will never, knowingly sell or rent your data to anyone. Ever. We protect it like it's our own.

We use a mixture of technical and procedural measures to ensure data protection. Access to the various software, applications and tools is restricted and strictly controlled within the organisation.

Most of our work is done using a desktop computer and/or the laptop, both of which are password protected at the login screens. As mentioned earlier all software applications and tools used within our business are password protected individually.

We subscribe to **Microsoft Office 365, Business package** which has its own security software, and we also subscribe to a recommended anti-virus provider which protects the various electronic devices from phishing, spam, trojans and other nasties associated with the cyber-crime world.

Documents containing personal data are shredded after use where there is no legal requirement for us to hold onto them.

We also invest in market-leading anti-virus, anti-spam, anti-trojan etc computer software, and review this regularly. All electronic devices used within the business or for business purposes are covered by the service contract.

Section 6: Your Rights under Data Protection Legislation (GDPR)

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”.) This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase

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your personal data to comply with local law. Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- a) if you want us to establish the data's accuracy;
- b) where our use of the data is unlawful, but you do not want us to erase it;
- c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds for it.

Request the transfer of your personal data to you or a third party. We will provide to you, or a third party you have selected, your personal data in a structured, commonly used, machine-readable format (most likely using Word or Excel software). This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Section 7: Who is the "Data Controller" in Snug Energy Ltd and how do I contact them?

The data controller is: Rebecca Dodds

And you can contact me via email, telephone or mail:

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	The best way to reach me is via email rebecca.dodds@snugenergy.co.uk
	01302 430999
	Snug Energy Ltd Unit 3 A G Estates Gunhill Lane Armthorpe Doncaster DN3 3FS

Section 8: How to Make a Complaint

We try our best, we're only human and mistakes can happen occasionally.

If you feel that we haven't looked after your personal data properly, please let us know and we'll do our best to rectify the situation.

However, at any time, you have the right to lodge a complaint with the UK's supervisory authority: The Information Commissioner's Office (www.ico.org.uk)

Our registration number is: ZA454054

Section 9: Disclaimer

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee 100% the security of your personal information transmitted to our website. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website, including the illegal acts of third parties (such as criminal hacking).

The terms of this Policy may change from time to time. If we make material changes to how we treat your personal data we will notify you by email to the email address specified on your account. Your continued use of our services and website constitutes your consent to such revised Privacy Policy.

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If you have any questions concerning the contents of this or any supporting Policy documents, please contact us via rebecca.dodds@snugenergy.co.uk

Date of Next Planned Document Review: June 2020