

PRIVACY NOTICE

It is our pride to take care of our customers, clients and associates privacy.

This Privacy Notice is our public declaration of how Lockrite Locksmith Ltd applies to the Data Protection Principles and rights afforded to all individuals by the general Data Protection Regulations (GDPR) and to the personal data that we process (as a data controller). Lockrite Locksmiths Ltd is committed to complying with the principles relating to processing of information and personal data under the GDPR Regulations (EU) 2016/679

Who is collecting information about me?

Legal Entity and Trading Name: Lockrite Locksmiths Ltd

Registered Address: 8 Christow Road, Marsh Barton, Exeter, Devon. EX2 8QP

Registered in England & Wales Reg. No: 06345788

Data Protection Officer & Point of Contact;

As a company we have set up a GDPR working committee and a designated point of contact officer. Any communications can be sought via our website at www.locktite.org or direct in writing to;

F.S.A.O. the GDPR Officer, 8 Christow Road, Marsh Barton, Exeter, Devon. EX2 8QP. You may also request a "Subject Access Request Form" by the same means.

What legal basis do we have for processing your information?

Lockrite Locksmiths Ltd process your data on the legal basis of Legitimate Interest.

What are the "Legitimate Interests" being pursued that allow you to process my information!

As a company, we act as a data controller operating within the locksmith service sector and derived services associated to the aforementioned sector. We have a network of associated contractors, key national account partners/customers and information protection IT specialists. We also have a supply chain of highly accredited specialists, as such, we have certain legal responsibilities to retain relevant documentation via such sources as HMRC etc.

As a controller and a processor of your data, the following apply;

- A controller determines the purpose and means of processing personal data
- A processor is responsible for processing personal data on behalf of a controller (e.g. in-house staff). Further detailed definition of the controller/processor roles can be found on the ICO website <http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

The Legitimate Interests pursued by Lockrite Locksmiths Ltd are;

- As a company, Lockrite Locksmith Ltd offers an array of services and products such as door entry, lock replacements, glass boarding up, CCTV alarm installations, other peripheral goods and services. In this we have certain legal and moral obligations to our customers, suppliers and legal entities such as the HMRC and Environmental Agency etc.
- We believe that it is in the interests of all parties concerned, including customers, suppliers, staff and stakeholders to ensure that we process information in order to facilitate their interests both morally and legally. To this end, we will need to acquire certain information in order to maintain both moral and legal quality.
- We understand that our buyers (customers) and suppliers would expect us to attain all necessary information in order to attain high standards of information quality and in doing so, we output minimum privacy impact.

Legal basis of processing;

LockRite Locksmiths Ltd may process Personal Data relating to customers/suppliers/users if one of the following applies:

Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.
- In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Types of Data/information we are collecting;

Collecting sources

Among the types of Personal Data that we collect, either via the internet, invoicing etc. or via third parties are: *Cookies, Usage Data, geographic position, email address, first name, last name, phone number and ZIP/Postal code.*

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is necessary and failure to provide this Data may make it impossible for our Website to provide our services. In cases where this Website specifically states that some Data is not necessary, users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner via a Subject Access Request. Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website, serves the purpose of providing the Service required by the User. This is in addition to any other purposes that may be described in future.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

Methods of processing;

LockRite Locksmiths Ltd will endeavour to take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of your Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

What information are you collecting from me?

We collect and store data for the purpose of legal obligation and to satisfy our quality accreditations. We may also be supplied with your data/information via one of our third part customers and commercial partners which you may possibly be a customer of.

The categories of personal data that we collect and process are;

- **Personal details:** e.g. Contact names, addresses, email address, telephone numbers (private and or commercial), next of kin for secondary contact purposes etc.
- **Financial details:** Bank account/credit card details, possibly details of your business.
- **Possible employment/employee details:** your company telephone numbers, registration numbers, VAT details etc.

Your rights as a customer/user

You may exercise certain rights regarding your Data processed by Lockrite - In particular, you have the right to do the following:

- **Withdraw your consent at any time.** You have the right to withdraw consent where you have previously given their consent to the processing of their Personal Data.
- **Object to processing of your Data.** You have the right to object to the processing of your Data if the processing is carried out on a legal basis other than consent.
- **Your Right to be informed.** You have the right to learn if Data is being processed by Lockrite, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing. Lockrite Locksmiths Ltd is deemed to provide fair processing of information by way of the privacy notice.
- **Verify and seek rectification.** You have the right to verify the accuracy of your Data and ask for it to be updated or corrected. Such a request should be made via a "Subject Access" request form via GDPR@lockrite.org or via the GDPR page on our website at www.lockrite.org
- **Restrict the processing of your Data.** You have the right, under certain circumstances, to restrict or block the processing of your Data. In this case, Lockrite will not process your Data for any purpose other than for storing it or in compliance of our statutory obligations for record retention.
- **The Right to Erasure (also known as the "Right to be forgotten).** You have the right, under certain circumstances, for your information/data to be erased. We will delete your information upon request if there is no compelling reason for us to keep it, such as your ongoing warranties, legal statutory retentions etc.
- **You have the right to receive your Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance;** This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof. Please see our IT Privacy Notice for more details.

- **Rights related to automatic decision making and profiling;** Where we use automatic decision making that produces a legal effect or similarly effect upon you, we will inform you of how and when this will happen. As applicable, where the decision is fully automated, we will obtain your consent,
- **Lodge a complaint.** You have the right to bring a claim before a competent data protection authority.

Email: GDPR@lockrite.org

By Post: F.A.O. the GDPR Officer, 8 Christow Road, Marsh Barton, Exeter, Devon. EX2 8QP.

Your right to complain to the supervisory Authority;

If you feel that you are unhappy with our response, you have the right to complain to the supervisory Authority, the details of which are;

Supervisory authority, Information Commissioners Office (ICO) <http://ico.org.uk/concerns/>

Special notes

Details about the right to object to processing. Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights; Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data;

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance;

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy;

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

Our Website does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy;

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should any changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, when required and where practicably possible.