

## Bailey Johns (PHL) Ltd Privacy notice

The General Data Protection Regulations (GDPR), brought into force by The Data Protection Act 2018, require Bailey Johns (PHL) Ltd to handle data in a certain manner.

Under GDPR individuals have the following rights:

- To be informed,
- Of access,
- To rectification,
- To erasure,
- To restrict processing,
- To data portability,
- To object, and
- Not to be subjected to automated decision-making including profiling.

Bailey Johns (PHL) Ltd will use the data it collects for the following purposes :

- In order to fulfil contractual obligations with our Regular Service Order (RSO) customers,
- In order to comply with statutory duties (legitimate interest), laid out by Gas Safe / Building Regulations (annual gas inspection), with the approved person scheme of OFTEC and to comply with manufacturer's warranties (and other appropriate / successor bodies).
- In order to be able to make or defend a legal claim, around the use of gas equipment or in relation to asbestos.
- Legitimate interest to record details of heating equipment with Gas Safe.

Bailey Johns (PHL) Ltd has audited the information it holds, constantly reviews the personal data held and operates a data protection by design and by default approach. We've ensured that all data collected is held in a secured manner, with access restricted to the public.

A mechanism is in place to effectively detect, report and investigate a personal data breach

Data relevant to heating equipment will be retained for up to 40 years, to deal with the possibility of asbestos claims. Data relating to accounts will be retained for a period of up to 7 years, for HMRC purposes.

Customers are able to access data relating to themselves (and / or the equipment on their site) and individuals have the right to complain to the Information Commissioner's Office – details below.

Subject access requests shall be complied with within one month. Bailey Johns (PHL) Ltd can refuse or charge for requests that are manifestly unfounded or excessive. If a request is refused, Bailey Johns (PHL) Ltd will state the reason to the individual, explain they have the right to complain to the ICO, whom will also be notified.

RSO customers have an ongoing contract with Bailey Johns (PHL) Ltd to service their heating equipment, this is consent to receive our services and for us to record necessary contact details, relating to payment and heating equipment. This is specific, clear, prominent, opted-in, properly documented and easily withdrawn. When appointment letters go out, customers have the ability to cancel.

Bailey Johns (PHL) Ltd have always cared about our customer's privacy and data and maintain our commitment to use it responsibly. We do not sell your data to third parties and commit to continue treating your personal data with care and with security in mind. All staff that handle personal data in our organisation are aware of the requirements of GDPR and only access and process your data when necessary and in line with the GDPR legislation.

Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk)

Responsibility for data protection is the responsibility of the Company Secretary, who is also the Data Protection Officer.

Adopted 11<sup>th</sup> May 2018.