AVALON ACCESS LTD | AVALON ABSEILING LTD

AVALON THEMING LTD | TAURUS CONSTRUCTION LTD

PRIVACY NOTICE

Ref. – AG/CORP/POL004

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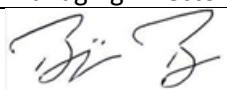
Approver Signature			
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Document Review Table			
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1.0	Document creation & implementation	David Hall	02/05/2018
2.0	Full review & update	Lorraine Furbank	26/02/2019
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7.0	Annual Review	Victoria Baldock	21/08/2023
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8.1	Amendment	Ian Braysher	July 2024

BACKGROUND

Avalon Abseiling Ltd (Avalon) understands that your privacy is important to you and that you care about how your personal data is stored, processed, used and removed. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We will only collect personal data that we believe to be essential in the delivery of the services we provide and where we have your permission to do so.

1. INFORMATION ABOUT US

COMPANY:	Avalon ProLtd.
REGISTERED ADDRESS:	Avalon House, 45 Tallon Road, Hutton, Shenfield, Essex, CM13 1TG.
COMPANY NUMBER:	04928022
EMAIL ADDRESS:	enquiries@avalonpro.co.uk
TELEPHONE NUMBER:	01277 500100

2. WHAT DOES THIS NOTICE COVER?

This Privacy Information explains how we use your personal data, how it is collected, how and why it is held and how it is processed. It also explains your rights under the law relating to your personal data.

3. WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation [EU Regulation 2018], (the "GDPR") as *'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'*.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. WHAT ARE MY RIGHTS?

Under the GDPR, you have the following rights. Rights which we will always work to protect and uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions. Contact details are set out in Paragraph 11 below.
- The right to access the personal data we hold about you. Para 10 will tell you how to do this.

- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Para 11 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Para 11 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that if data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Para 11.

Further information about your rights can also be obtained from the Information Commissioner's Office (ICO) or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. WHAT PERSONAL DATA DO YOU COLLECT?

We may collect some or all of the following personal data (this may vary according to your relationship with us).

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information

6. **HOW DO YOU USE MY PERSONAL DATA?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your files
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products or services for you

- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post that you have opted-into. You may unsubscribe or opt-out at any time by contacting our offices on 01277 500100 or emailing enquiries@avalonpro.co.uk
- With your permission and/or where permitted/required by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone, text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and the Data Protection Act 2018. You will always have the opportunity to opt-out.

7. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods:

Enquiries and quotations	Thirty-five days
Contract	Duration of the contract plus thirty-five days
Contract dispute	For length of time to settle dispute plus sixty days
Termination of contract	Termination date plus thirty-five days
Employment details	Six years after termination
Financial Details	7 years after preceding financial year end
Taxation	Minimum 7 years but up to 25 years (for capital gains)

Or, where there is no fixed period, the following factors will be used to determine how long it is kept:

Legal reason

Or, we will store data until it is requested to be removed from our systems if not covered by the factors or reasons as set out above.

Please also see our Personal Data Retention Policy

8. HOW & WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under UK Data Protection Legislation.

Data may be held either electronically or in paper (hard) format, or as a voice recording. Any paper records that we have to keep are stored in lockable, fire resistant metal cabinets to the recommended British Standard (BS 4438/1969)

Electronically held records are held under secure and encrypted conditions from an access point of view and from possible hacking. Access to electronic personal records are password protected and are restricted to persons who have a legitimate reason for access, i.e. “a need to know” basis.

We take cyber security very seriously and maintain state of the art anti-virus, and anti-hacking software to fend off any possible attempt to gain entry into the system. The system is subject to penetration testing at not more than bi monthly intervals by independent technical consultants.

An audit of personal data being held is undertaken bi-monthly to ensure that we are only holding personal data for which we can demonstrate justification, consent, contract or against a legal basis for retention.

Deletion of personal data is undertaken in strictly controlled conditions, either electronic or paper. External, accredited waste disposal agencies used for paper record destruction and a full audit trail of disposal is maintained.

External, fully accredited IT consultants are employed to ensure that the personal data is permanently deleted for which there is no demonstrable reason to retain.

9. DO YOU SHARE MY PERSONAL DATA?

We may sometimes share your personal data with third parties for various purposes, including accounting software, project management tools and our own personal CRMS.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Para 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, (and Data Protection Act 2018) as explained above in Para 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. HOW CAN I ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Para 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 10 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept informed of our progress.

11. HOW DO I CONTACT YOU?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

REGISTERED ADDRESS: Avalon House, 45 Tallon Road, Hutton, Shenfield, Essex, CM13 1TG

EMAIL ADDRESS: enquiries@avalonpro.co.uk

TELEPHONE NUMBER: 01277 500100

DATA CONTROLLER

As required by the GDPR, we have appointed a Data Controller, who is responsible for ensuing the safe collection, collation, keeping, storage, processing and disposal of any personal data we hold. The Avalon Data Controller is currently Victoria Baldock.

12. CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.