

## **Privacy Policy - Capital H Catering & Leisure Equipment Ltd**

We at Capital H Catering & Leisure Equipment Limited are committed to respecting and protecting your privacy and will only use your personal information to manage your account, process your order and to provide the products and services you have requested from us. We will never sell your data to third parties nor will we share your data without your consent. We will keep your personal information safe and secure at all times. This policy explains when and why we collect personal information about you, how we use it and keep it secure and the conditions under which we may disclose it to others. This Privacy Policy is effective from 14<sup>th</sup> May 2018.

### **How do we collect or obtain personal information about you?**

In person	when you visit our registered address to request a quotation, place an order or enquire about the products and services that we offer or when you interact with us at trade shows and networking events and knowingly supply us with your personal information
Digitally	when you email us directly at capital@capitalhcatering.com or when you visit our website and enter it into forms to contact us about general queries, quotations or products and services that we offer, when you opt-in to receive marketing communications from us or when you follow us on our social media accounts
Over the telephone	when you call our office to request a quotation, place an order or enquire about the products and services that we offer
From postal communications	when you send us a letter by mail

In all instances mentioned above, you consent for us to collect, store and use your information to contact you and carry out any legal obligations arising from contracts entered into by you and us.

### **What personal information do we collect from you and how is it used?**

We use your personal information for the following administrative and business purposes:

- To fulfil our contractual obligations with you - to contact you regarding your query/ quotation or order and process orders that you have made with us
- To seek your views or comments on services that we provide
- To notify you of changes to our services
- To contact you with marketing messages which you have requested to receive from us
- For analysis to improve our business and website and enhance your customer experience

<b>The information we collect</b>	<b>The reason we collect this information and how we use it</b>	<b>Our legal basis for processing this information</b>
Individual's name or company name (if applicable), billing address, email address, telephone number/s and event function details including the function dates, on site contact information and delivery address	For us to communicate with you and process queries, quotations, orders, payment transactions and deliveries.  We have a legal obligation to issue you with an invoice for the goods and services you acquire from us and we are	Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation  Necessary to perform a contract and/or to take steps at your request prior to entering into a contract

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	required to keep accounting records, including records of transactions for five years from the contract start date.	(Article 6(1)(b) of the General Data Protection Regulation)  Compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation)
Photocopies of two forms of identification for all new customers	This is done for security purposes so that we can legitimately identify the person we are entering into a contract with	Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)  Necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation)
Individual's name, billing address, credit/ debit card number, security code and expiry date	In order to process payment transactions when you are not present we may collect these details over the telephone but will never record the conversation or store this information once payment has been successfully processed.	Necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation)  Compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation)
Individual's name or company name (if applicable), email address, marketing preferences and consent, including date of consent	If you enter your details into forms on our website and opt-in to receive marketing communications from us we will keep a record of your consent showing that you agreed to receive these communications and the date on which consent was given.	Your consent (Article 6(1)(a) of the General Data Protection Regulation).  Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)
When you visit our website...  Your browser and operating system, the pages that you visit on our website, the date and time of your visit, geographical location data, and, for security reasons (e.g. to identify attacks on our website) the Internet protocol (IP) address assigned to you	When you visit our website, we may automatically collect some personal information about you. Our web servers store as standard the details listed on the left.  We collect this information using cookies (small text files which are transferred to your browser by the website to identify data traffic patterns, personalise contents and support security). Cookies do not provide any information which might disclose the identity of a specific person	Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)  Compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation)

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	<p>but they may potentially identify your computer, your browser and your internet settings. It is possible to switch off cookies by setting your browser preferences, however, turning cookies off may result in a loss of functionality when using our website.</p> <p>We have a legitimate interest in operating and improving our website, providing you with access to the pages you wish to access, understanding the interests of our potential customers, updating content and providing you with relevant information about our services.</p> <p>We have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.</p>	
<p>When you follow us on our social media accounts...</p> <p>Any personal information which you allow to be shared that is part of your public profile. This may include data such as your account name, gender, general interests, location and age</p>	<p>Our legal basis for processing personal information gathered through social media is our legitimate interest in providing marketing content and posts that are of interest to our followers</p>	<p>Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation.</p>
<p>When you visit our registered address...</p> <p>Your images may be captured on our closed-circuit security cameras</p>	<p>Our CCTV is merely for surveillance and security purposes and we will never share this footage with any third parties other than law enforcement bodies, if necessary</p>	<p>Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation</p>

# **Privacy Policy - Capital H Catering & Leisure Equipment Ltd**

## **Where do we store your personal data and how do we keep it secure?**

Your data is always stored safely and securely. We have an **electronic** and centralised **manual** record keeping system and we maintain technical and physical safeguards that are designed to protect the security and integrity of your personal information. These measures include but are not limited to encrypting transfer of data to and from our servers using SSL technology (secure sockets layer), device encryption, firewalls and virus checking procedures as well as restricted access and secure entry controls to offices. Where we keep personal information on local devices, these devices are password protected and accessible only to authorised employees. Our website and our servers have appropriate technical measures in place to protect against unauthorised or unlawful use of your personal information. However, no data transmission over the internet can be guaranteed to be 100% secure and whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk.

**Electronic records** – all of the software applications we use are password protected and are only accessible by authorised employees of Capital H Catering & Leisure Equipment Limited

- Our internal computer networks
- Email communications
- Cloud based rental management software
- Cloud based accounting software
- Website servers

**Manual (paper) records** - no unauthorised access is granted to any of our paper records and these are kept on premises in lockable cabinets, offices and stores. We do not operate a mobile working policy so these records will never leave our registered address.

We regularly review our security systems to ensure that your personal information remains safe and secure.

## **Who has access to customer data and is any information disclosed to third parties?**

Only authorised employees of Capital H Catering & Leisure Equipment Limited will have access to your data from the beginning to the end of your contract for the purpose of carrying out their duties.

We will never sell any of your personal information to third parties. We may however disclose only the personal information that is necessary with the following business partners, service providers and third parties as an essential part of being able to fulfil any contracts we enter into with you. Our legal basis for processing this information: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation) and Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

These are the business partners and service providers that we may need to disclose your data to:

- Our business accountant – for completing tax returns and end of year accounts
- Rental software provider – to manage technical issues if they occur
- Accounting software provider - to manage technical issues if they occur
- Website developer and hosting provider - to manage technical issues if they occur and for handling enquiries and consents provided through our website
- Google Services – for website analytics
- Law enforcement bodies – if we suspect criminal conduct has occurred

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We do not display the identities of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please make a request in writing to the following address: Capital H Catering & Leisure Equipment Limited, North Feltham Trading Estate, Unit 3 Marlin Park, Central Way, Feltham, Middlesex, TW14 0AN and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

### **How long do we retain personal information and how is it disposed of?**

We will hold on to your personal information only for as long as is necessary taking into account any legal obligations we have (e.g. to maintain records for tax purposes) and any other legal basis we have for using your information (e.g. your consent, performance of a contract or legitimate interest as a business). We carry out routine weeding to remove old information. When records are no longer deemed relevant for business they are erased from our computer network and all software applications and paper records are shredded and responsibly disposed of.

### **Your rights in relation to your personal information**

We will never contact you unless you have consented for us to do so. You can change your preferences at any time and have the right to:

- access and update/correct the personal information we hold about you
- request that we delete your data, or stop collecting and processing it
- stop receiving direct marketing messages and material
- unsubscribe from mailing lists

To obtain a copy of the information we hold about you or to update or change your preferences please make a request in writing to the following address and this will be processed within one month, at no charge: Capital H Catering & Leisure Equipment Limited, North Feltham Trading Estate, Unit 3 Marlin Park, Central Way, Feltham, Middlesex, TW14 0AN.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. Where we possess appropriate information about you on file, we will attempt to verify your identity using that information. If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

### **Are there any age restrictions in supplying personal information to us?**

We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18. If we become aware that you are under 18 and are attempting to or have submitted personal information via forms on our website without your parent/guardian's permission, we will take steps to remove such information from our records.

### **Review of this Policy**

We keep this policy under regular review and may update it from time to time to reflect changes in our business and how we are processing your data. This Policy was last updated on 14<sup>th</sup> May 2018.