

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and cases/ examples where we collect your personal data.

We're Bluewater Plumbers Ltd, Hyde Park House, Cartwright Street, Hyde, SK14 4EH. We are a data controller of your personal data.

Our UK data protection registration number is ZA277079

We have a dedicated data protection officer ("DPO"). You can contact the DPO by writing to the above address, marking it for the attention of the DPO, or by using the contact details in your sales terms or going to the Contact Us section of our website.

1. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history;
- **Your date of birth, gender and/or age;**
- **Your nationality**, if needed for the product or service;
- **Records of your contact with us** such as via the phone number of our office and, if you get in touch with us online using our website or external third-party websites;
- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used;
- **The usage of our products and service**
- **Marketing to you and analysing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you;
- **System information**, such as make and model, faults, repairs and repair costs;
- **Information which we obtain from Credit Reference Agencies**, including public (e.g. defaults, CCJs) and shared credit history, financial situation and financial history;
- **Information about your property**, such as location, number of rooms, property type and building work you've had done;
- **Information about your employment status**, if relevant;
- **Information about your property occupier status**, such as whether you are a tenant, live with parents or are an owner occupier of the property; and
- **Insights about you and our customers** gained from analysis or profiling of customers.

2. What is the sources of your personal information?

We'll collect personal information from the following general sources:

- From you directly;
- Information generated about you when you use our products and services;
- From a broker or other intermediary (e.g. referral websites) who we work with to provide products or services or quote to you;
- Business partners (e.g. letting agents) or others who are a part of providing your products and services or operating our business;

3. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes;

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms;
- Managing products and services relating to the product or service, or application for one;
- Updating your records, tracing your whereabouts, and recovering debt;
- Managing any aspect of the product of service;
- To perform and/or test the performance of our products, services and internal processes;

- To follow guidance and best practice under the change to rules of governmental and regulatory bodies;
- For management and auditing of our business operations including accounting;
- To monitor and to keep records of our communications with you and our staff (see below);
- For market research and analysis and developing statistics;
- For direct marketing communications and related profiling to help us to offer you relevant products and service. We will send marketing to you by SMS, email, phone, post, social media and digital channels (e.g. using Facebook Customer Audiences and Google Custom Match). Offers may relate to any of our products and services we think may be on interest;
- To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which offers or promotions to show you on our digital channels;
- To develop new products and services and to review and improve current products and services;
- To comply with legal and regulatory obligations, requirements and guidance; and
- To facilitate the sale of one or more parts of our business;

4. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

- 1) Where it is needed to provide you with our products or services, such as:
 - a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product or service, the price, the payment methods available and the conditions to attach;
 - b) Managing products and services you hold with us, or an application for one;
 - c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate);
 - d) All stages and activities relevant to managing the product of service including enquiry, application, administration and management of accounts, guarantees, and building regulation notifications.
- 2) Where it is in our legitimate interests to do so, such as:
 - a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate);
 - b) To perform, test the performance of, products, services and internal processes;
 - c) To follow guidance and recommended best practice of government and regulatory bodies;
 - d) For management and audit of our business operations including accounting;
 - e) To carry out searches at Credit Reference Agencies, where you have applied for credit terms, pre-application, at the application stage, and after that.
 - f) To carry out monitoring and to keep records of our communications with you and our staff (see below);
 - g) For market research and analysis and developing statistics;
 - h) For direct marketing communications and related profiling to help us to offer you relevant products and service. We will send marketing to you by SMS, email, phone, post, social media and digital channels (e.g. using Facebook Customer Audiences and Google Custom Match).
 - i) When we share your personal information with these other people or organisations other than for providing products and services to you, as necessary for running our business or comply with legal regulatory obligations.
- 3) To comply with our legal obligations
- 4) With your consent or explicit consent:

a) For some direct marketing communications

5) When do we share your personal information with other organisations?

- Business partners (e.g. financial institutions, insurers) or others who are a part of providing your products and services or operating our business;
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, Gas Safe, the Ombudsman, and the Information Commissioner's Office.
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- Credit Reference Agencies (see below);
- Market research organisations who help us to develop and improve our products and services.

6) **How and when can you withdraw your consent?**

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us in writing to: Bluewater Plumbers, Hyde Park House, Cartwright Street, Hyde, SK14 4EH; or by going to the Contact Us section of our website.

7) **Is your personal information transferred outside the UK or EEA?**

We're based in the UK, but sometimes your personal information may be transferred outside the European Economic Area, if we do so, we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

8) **How do we share your information with credit reference agencies?**

If you make an application for credit terms or finance products, we'll perform credit and identity checks on you with one or more credit reference agencies (CRAs). Where you take financial or credit from us we also make periodic searches at CRAs to manage your account with us. To do this, we'll supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both (including electoral register) and shared credit, financial situations and financial history information and fraud prevention information.

We'll use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Assess payment methods available to you;
- Trace and recover debts; and
- Make sure any offers provided to you are appropriate to your circumstances

9) **What should you do if your personal information changes?**

You should tell us so that we can update our records. The contact details for this purpose are available on our Contact Us page, available at www.bluewaterplumbers.co.uk

10) Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

11) Do we do any monitoring involving processing of your personal information?

In this section, monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face to face meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, and for quality control and staff training purposes. This information may be shared for the purposes described above.

12) For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations;
- For as long as we provide goods and/ or services to you and then for as long as someone could bring a claim against us; and/ or
- Retention periods in line with legal and regulatory requirements or guidance.

13) What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

- The right **to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right **to object** to processing of your personal information;
- The right **to restrict processing** of your personal information;
- The right **to have your personal information erased** (the "right to be forgotten");
- The right to **request access** to your personal information and to obtain information about how we process it;
- The right to **move, copy or transfer your personal information** ("data portability"); and
- Rights in relation **to automated decision making which has a legal effect or otherwise significantly affects you**.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws – <https://ico.org.uk/>. You can contact our DPO for more details on all the above.

14) Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us using the contact details on the Contact Us page at www.bluewaterplumbers.co.uk to exercise these rights.

15) What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels (e.g. Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time to contacting us using the details below or by following the instructions in the communications.

Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you revisit our website – www.bluewaterplumbers.co.uk/privacy-policy

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can use the contact details at the Contact Us section of our website. Alternatively, you can write to Bluewater Plumbers Ltd, Hyde Park House, Cartwright Street, Hyde, SK14 4EH, marking it for the attention of the DPO or email office@bluewaterplumbers.co.uk

