

COMPANY DATA PRIVACY NOTICE (EXTERNAL)

This is privacy notice of Alternative Cleansing Ltd. The Company Director as the data controller is responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). Our registered address is Fishers Farm, Upper Landywood, Cheslyn Hay, Walsall WS6 7AX. For all data matters contact clive@alternativecleansing.co.uk.

We are committed to protecting the privacy and security of the personal data which we collect about our customers and users of our services ("you", "your"). We want to make your experience when dealing with us safe and satisfying. Therefore, the purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website, through our online contact form or when you are engaging in our services. The privacy notice sets out our information gathering practices from our website and when dealing with us through other channels or systems. We'll also tell you about your privacy rights and how the data protection laws protect you.

The Company reserves the right to update the privacy notice at any time without notice, which should also be read in conjunction with the Company Data Protection Policy. Any updates will be in accordance with current applicable privacy legislation.

Definitions

Data Controller	Determines the purposes and means of processing personal data.
Data Processor	Is responsible for processing personal data on behalf of the controller.
Data Subject	A natural person.
Personal Data	Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (Article 6 GDPR) e.g. name, passport number, home address. Online identifiers include IP addresses and cookies.
Special Categories of Personal Data	Sensitive data (Article 9 GDPR) including genetic data, biometric as processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Third-party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

What are your rights?

Under GDPR, you have the following rights in respect of your personal data, which we will always work to uphold, subject to overriding legal obligations;

- The right to be informed about our collection and use of your personal data.
- The right to access and request a copy of the personal information we hold about you.

- The right to have your personal data rectified if any of the information is inaccurate or incomplete.
- The right to be forgotten (the right to ask us to delete or otherwise dispose of any of your personal data that we have).
- The right to restrict (i.e., prevent) the processing of your personal data.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means).
- The right to object to our processing of personal data, where applicable i.e., where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact clive@alternativecleansing.co.uk.

What personal data do we collect about you?

If you are accessing general information from our website, it won't be necessary for you to provide any data. However, if you wish to contact us, or engage our services, you may need to provide us with certain information to facilitate this. Personal data, or personal information, means any information about an individual from which that person can be identified. You have the right to withhold information which is not required for the service which has been requested.

We may collect, use, store and transfer different kinds of personal data about you which including Identity Data (including your name) and Contact Data (telephone number, email and address). We retain any correspondence and requests which you make which may contain personal data.

We do not collect any special categories of data about you, nor do we collect any information about criminal convictions and offences. No cookies will be collected through the browsing or accessing of our website.

How do we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** whereby processing your data is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Comply with a legal or regulatory obligation** is the processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- **Consent** is a legal basis which we do not typically rely on for the processing of your personal data, other than in relation to sending marketing communications.

The table below details the ways in which we plan to use your personal data and the legal basis which we rely on for the processing of these. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Further details can be provided by contacting clive@alternativecleansing.co.uk.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register a query or request for information/quotation for work with us via our online contact form	Performance of a contract with you
To register you as a new customer	Performance of a contract with you
To collect information to be able to offer you the appropriate service as a customer (e.g. dealing with ongoing support, follow up requirements)	Performance of a contract with you, Legitimate interest of the business
Ongoing administration relating to services to comply with any legal obligations	Legal obligation
To track deliveries/visits and make you aware of any changes which we may need to make to the service you have purchased	Performance of a contract with you, Legitimate interest of the business
Asking you for feedback or to take part in surveys	Legitimate interest of the business
So that we can offer you competitive pricing and the best service	Based on consent, Legitimate interest of the business
To protect our business and ensure efficiency via our website. To protect, investigate and deter against unauthorised activity	Legitimate interest of the business

To use data analytics to improve our website, products and services, and the customer experience	Legitimate interest of the business
To make suggestions to you about the services which may be available or suitable for you	Based on consent, Legitimate interest of the business

How long do we keep your data for?

We will retain your data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations. At the end of the retention period, your data will be securely deleted or anonymised, so that it can be used in a non-identifiable way for statistical analysis or business operational planning. Data will be retained in line with the Company Data Retention Policy and any statutory obligations, after which time it will be removed from our files.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data, as outlined in Your Legal Rights.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact clive@alternativecleansing.co.uk.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who is your data shared with?

The Company is committed to the protection of your data. We do not share information with third parties, except for in cases identified below. We require all third parties to respect the privacy of your personal data and treat it in accordance with the law. We do not allow third-party providers to use your data for their own purposes and only permit them to use data for a specified purpose as per our instructions. Third-party providers have their own policies relating to privacy and handling of information, for which we do not accept responsibility and would recommend that you read these. The Company has no control over the content of other websites.

- In order to process payments for services, assess a credit limit or in the event of any unpaid/overdue transactions.
- Professional advisers acting as processors including lawyers, auditors, accountants and insurers based in the UK who provide consultancy services as required.
- We may disclose your personal information the police or other bodies with authority to request such information and/or fraud prevention agencies for the purpose of preventing fraud/loss, to prevent, detect or discourage crime and/or for the apprehension of prosecution of offenders.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We do not transfer your data outside of the UK.

What about data security?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Will there be any charge for requesting the data?

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Will we need anything from you?

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

What are the timescales?

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

What to do if you still have queries or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact clive@alternativecleansing.co.uk.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

Version	Date	Author	Summary of Revisions
1.0	Dec 2021	HR	New version – legislative compliance